ESTTA Tracking number:

ESTTA766686 08/25/2016

Filing date:

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| Proceeding | 92060328 |
|---------------------------|---|
| Party | Plaintiff L.A. Gem and Jewelry Design, Inc. |
| Correspondence Address | MILORD A KESHISHIAN MILORD & ASSOCIATES PC 10517 WEST PICO BLVD LOS ANGELES, CA 90064 UNITED STATES uspto@milordlaw.com |
| Submission | Motion to Compel Discovery |
| Filer's Name | Milord A. Keshishian |
| Filer's e-mail | uspto@milordlaw.com |
| Signature | /Milord A. Keshishian/ |
| Date | 08/25/2016 |
| Attachments | LAR08-061T Motion to Compel Rogs and RFP - final.pdf(310175 bytes) LAR08-061T MAK Declaration and Ex A-E.pdf(4815853 bytes) LAR08-061T MAK Declaration Ex. F-G.pdf(4204795 bytes) |

TRADEMARK APPLICATION Ref. No. LAR08-061T

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Trademark Registration No.: 3,811,074

Filed: May 13, 2009

Mark: LOVE IS FOREVER (stylized)

L.A. GEM AND JEWELRY DESIGN, INC.,

Petitioner,

V.

SOUKI MANUFACTURING, INC.

Respondent.

Petitioner,

PETITIONER'S MOTION TO COMPEL

DISCOVERY RESPONSES AND TEST

THE SUFFICIENCY OF RESPONSES TO

REQUESTS FOR ADMISSION;

REQUEST TO SUSPEND THE TRIAL

SCHEDULE

MOTION

Pursuant to 37 C.F.R. §2.120(e) and Federal Rules of Civil Procedure Rules 33, 34 and 37, Petitioner L.A. GEM & JEWELRY DESIGNS, INC. ("Petitioner") hereby moves the Trademark Trial and Appeal Board ("Board") for an order compelling Respondent SOUKI MANUFACTURING, INC. ("Respondent") to (1) provide substantive responses to Petitioner's First Set of Interrogatories, Nos. 1 through 61; (2) provide amended responses to Petitioner's First Set of Requests for Production, Nos. 1 through 45; (3) provide all relevant documents and things in response to Petitioner's First Set of Requests for Production; and (4) provide amended responses to Petitioner's First Set of Requests for Admission.

Pursuant to 37 C.F.R. §2.120(e)(2), Petitioner further requests that the Board issue an order suspending the proceeding with respect to all matters not germane to this motion, and that

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the trial schedule subsequently be reset.

This motion is based on the following memorandum, the declaration of Milord A.

Keshishian ("Keshishian Decl.") and exhibits thereto, and such evidence and further argument as the Board may consider.

MEMORANDUM OF POINTS AND AUTHORITIES

I. FACTUAL BACKGROUND

Petitioner served its first set of interrogatories, requests for production and requests for admission on Respondent on March 11, 2016 ("Petitioner's Discovery Requests"). Keshishian Decl. ¶¶ 2, 3 and 4; Exhibits A, B and C. On or about April 7, 2016, Respondent mailed its responses. Keshishian Decl. ¶¶ 5, 6 and 7; Exhibits D, E and F. Respondent's responses to Petitioner's Discovery Requests were completely incomprehensible and unintelligible. Moreover, Respondent failed to produce *any* documents.

Petitioner made a good faith effort to resolve this matter in a manner that would avoid the need to file this Motion by emailing and mailing a letter to Respondent on June 3, 2016 noting the lack of documents produced and the unfounded responses. Keshishian Decl. ¶ 8; Exhibit G. Petitioner further requested that Respondent provide supplemental responses to its discovery; however, to date, Respondent has failed to respond to Petitioner's meet and confer letter, has failed to provide amended discovery responses and has failed to produce *any* documents. It should be noted that Respondent has further failed to provide Initial Disclosures or an Initial Production. Keshishian Decl. ¶ 10. Respondent has completely stonewalled Petitioner in this matter, which should not be condoned. Respondent's failure to respond to Petitioner's meet and confer efforts and its failure to resolve these discovery disputes informally has forced Petitioner to seek this Board's intervention.

II. MOTION TO COMPEL RESPONDENT'S DISCOVERY RESPONSES

A. Respondent Should be Compelled to Provide Substantive Responses to Petitioner's Interrogatories

Pursuant to Federal Rule of Civil Procedure 33(a)(2), "[a]n interrogatory may relate to any matter that may be inquired into under Rule 26(b)." Federal Rule of Civil Procedure 26(b) provides "the scope of discovery is as follows: Parties may obtain discovery regarding any nonprivileged matter that is relevant to any party's claim or defense-including the existence, description, nature, custody, condition, and location of any documents or other tangible things and the identity and location of persons who know of any discoverable matter. For good cause, the court may order discovery of any matter relevant to the subject matter involved in the action. Relevant information need not be admissible at the trial if the discovery appears reasonably calculated to lead to the discovery of admissible evidence."

Here, Petitioner's interrogatories are relevant and are directly implicated by the allegations in the Petition for Cancellation and Respondent's purported Answer. For example, Petitioner has requested that Respondent identify the LOVE IS FOREVER mark's date of first use in United States commerce, steps taken to develop goods sold in connection with the mark and where goods have been sold under the mark. These are just a few of examples of the information Petitioner seeks in order to prepare for trial.

However, Respondent provided no substantive answers to any of Petitioner's 61 interrogatories. Instead, Respondent copied and pasted the same nonsensical response to each interrogatory:

"It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared. But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel. Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/ purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

The grounds of this case asserted by Mr. Milord A. Keshishian and member is ABANDONMENT of/by me my trademark, Love is Forever ®, but I have never abandoned as I repeatedly explained since filing this case 11/05/2014 and since I have started to intend to use this trademark, Love is Forever ®.

It is highly antisocial and unwelcome that telling the opposite to the truth trying to make TTAB to believe opposite way to the fact abusing the difficulty of overseas matter to confirm, such as I, defendant, being in Yokohama in Japan as Pro Se no proxy in USA.

So people, even an infant has been highly respectfully recommending you "Mr. Milord A. Keshishian and the member. Go away with high pride, disappear for high respect and your long prosperity not for the wrinkled no tooth old beggar and witch, " I hypothetically has been felt.

Life is short, even you live 100 years old, it is 36,500 days only.

You are professional but I am an amateur in legal matter, and so if you lose, it will ruin yourself and qualification of attorney completely, I feel so. I suppose that is why Madam Catherine M. C. Farrelly had withdrawn wisely smartly from the case and it was appraised by legal matter market, clients and clients-to-be, I think. And it seems that she has been very busy in her legal business since withdrawal.

I think her withdrawal from her case, 92058656, realized/achieved to obtain belief/reliability/supports of her clients, clients-to-be etc, demand of market of legal matter, I think. She did a very effective/fruitful performance, the withdrawal, it obtains the successfulness to achieve/attain/satisfy the legal market demand, I feel. If she moves step by step accordingly from now on her business future is to be so shiny/bright, I feel.

I had sincerely presented the words "I am certain that prosperity is happy to visit you," when she had started to take the procedure to withdraw from 92058656 September 24 or so, 2015 Japan Standard Time.

The strongest is morally good because people, clients, clients-to-be are happy to be with morally good persons etc I think.

And if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world."

Respondent's responses to Petitioner's First Set of Interrogatories are incomprehensible and unintelligible. Rather than identifying any information sought by Petitioner, Respondent treats the matter as a game, improperly, conclusively and repeatedly stating that it has not abandoned the LOVE IS FOREVER mark- when he in fact has never used the mark in commerce, let alone abandon it.

Respondent has further failed to properly object to any of Petitioner's interrogatories. Thus, Respondent has waived all objections. A party objecting to an interrogatory must "particularize" its basis for each objection. Fed. R. Civ. P. 33(b)(4) ("The grounds for objecting to an interrogatory must be stated with specificity."); see also Burns v. Imagine Films

Entertainment, Inc., 164 F.R.D. 589, 593 (W.D.N.Y. 1996) ("[O]bjections to interrogatories must be specific and supported by detailed explanation of why the interrogatories are objectionable."). Respondent has not asserted any objections or provided any explanation for why Petitioner's Interrogatories are objectionable. Petitioner cannot reasonably prepare for trial until Respondent has completely complied with its discovery obligations. Notably, on multiple occasions, this Board has requested that Respondent engage counsel to assist it with this matter, which it has failed to do. Respondent has failed to take this matter seriously. Thus, Petitioner seeks an order compelling Respondent to provided complete responses to Interrogatories 1 through 61.

B. Respondent Should be Compelled to Provide Amended Responses to Petitioner's Requests for Production and Provide All Responsive Documents

Respondent provided incomplete, nonresponsive answers to Petitioner's requests for production ("RFP"), and it should be required to respond fully to these RFPs and produce all

related documents. Respondent's responses offer no specific objection to these RFPs and certainly no justification for why the RFPs were not answered in their entirety. Respondent merely repeated the same nonsensical response to all 45 RFPs:

"Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

The grounds of this case asserted by Milord A. Keshishian and member is ABANDONMENT of/by me my trademark, Love is Forever ®, but I have never abandoned as I repeatedly explained since filing this case 11/05/2014 etc and since I have started to intend to use this trademark, Love is Forever® and I have started to prepare the products for the trademark.

Another ANTISOCIAL point is Mr. Milord A. Keshishian and the member have been telling opposite way to the fact and try to make Tf AB to believe opposite way to the fact by telling I have abandoned my trademark, Love is Forever ®, in this way I have been felt. I have never abandoned the trademark. I have been preparing my products for the trademark.

This ANTISOCIAL point has been known/confirmed by TTAB, so feel I hypothetically.

It is highly ANTISOCIAL and unwelcome that telling the opposite to the truth trying to

make IT AB to believe opposite way to the fact abusing the difficulty of overseas matter to confirm, such as I, defendant, being in Yokohama in Japan as Pro Se no proxy in USA.

So people, even an infant has been highly respectfully recommending you saying "Mr. Milord A. Keshishian and the member. The wrinkled no tooth old man and witch, go away," I hypothetically has been felt.

Life is short, even you live 100 years old, it is 36,500 days only.

The strongest is morally good because people, clients, clients-to-be are happy to be with morally good persons etc.

You are professional but I am an amateur in legal matter, and so if you lose, it will ruin yourself and qualification of attorney substantially completely, I feel so hypothetically. suppose that is why Madam Catherine M. C. Farrelly had withdrawn wisely smartly from the case and it was appraised by legal matter market, clients and clients-to-be, I think. And it seems that she has been very busy in her legal business since withdrawal.

I think her withdrawal from her case, 92058656, realized/achieved to obtain belief/reliability/supports of her clients, clients-to-be etc, demand of market of legal matter, I think. She did a very effective/fruitful performance, the withdrawal, it obtains the successfulness to achieve/attain/satisfy the legal market demand, I feel. If she moves step by step accordingly from now on her business future is to be so shiny/bright, I feel.

I had sincerely presented the words "I am certain that prosperity is happy to visit you," as a merchant or so when she had started to take the procedure to withdraw from 92058656 September 24 or so, 2015 Japan Standard Time."

Under Federal Rules of Civil Procedure 26(e)(1)(A), a duty to correct prior discovery responses arises "if the party learns that in some material respect the disclosure or response is incomplete or incorrect." Here, Respondent has completely failed to respond to Petitioner's requests; thus, it must supplement said responses. Respondent must also produce any relevant documents. *To* date, Petitioner has not received <u>any</u> document production from Respondent.

III. MOTION TO TEST THE SUFFICIENCY OF APPLICANT'S RESPONSE TO PETITIONER'S REQUESTS FOR ADMISSION

Pursuant to Federal Rules of Civil Procedure 36(a)(4):

If a matter is not admitted, the answer must specifically deny it or state in detail why the answering party cannot truthfully admit or deny it. A denial must fairly respond to the substance of the matter; and when good faith requires that a party qualify an answer or deny only a part of a matter, the answer must specify the part admitted and qualify or deny the rest. The answering party may assert lack of knowledge or information as a reason for failing to admit or deny only if the party states that it has made reasonable inquiry and that the information it knows or can readily obtain is insufficient to enable it

to admit or deny.

Respondent's answers clearly violate Rule 36(a)(4). In fact, in similar fashion to the

above discussed discovery, Respondent merely copied and pasted the same nonsensical response

to each request. Thus, the responses do not "fairly respond to the substance of the matter" and

must be amended.

IV. **CONCLUSION**

Based on the foregoing, the Board should grant Petitioner's motion to compel and order

the Respondent to (1) provide substantive responses to Petitioner's First Set of Interrogatories,

Nos. 1 through 61; (2) provide supplemental responses to Petitioner's First Set of Requests for

Production, Nos. 1 through 45; (3) provide all relevant documents and things in response to

Petitioner's First Set of Requests for Production; and (4) provide amended responses to the

Petitioner's First Set of Requests for Admission.

Petitioner further requests an order that the proceeding be suspended and new trial dates

set at least sixty days from the date of the Board's order.

Dated: August 24, 2016

Respectfully submitted,

MILORD & ASSOCIATES, PC

/Milord A. Keshishian/

Milord A. Keshishian, Esq.

Attorneys for Petitioner

L.A. GEM AND JEWELRY DESIGN, INC.

10517 West Pico Boulevard

Los Angeles, CA 90064

Telephone: (310) 226-7878

Facsimile: (310) 226-7879

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on August 25, 2016, I caused a true and correct copy of the foregoing PETITIONER'S MOTION TO COMPEL DISCOVERY RESPONSES AND TEST THE SUFFICIENCY OF RESPONSES TO REQUESTS FOR ADMISSION; REQUEST TO SUSPEND THE TRIAL SCHEDULE to be sent via email, to Registrant's Correspondence of Record as follows:

Souki Manufacturing, Inc. 326-6 Sakamoto-cho Hodogaya-ku, Yokohama-shi Kanagawa 240-0043 Japan

Email: mina-csj@nifty.com

/Milord A. Keshishian/ Milord A. Keshishian 10517 West Pico Boulevard Los Angeles, CA 90064 Telephone: (310) 226-7878 Facsimile: (310) 226-7879

TRADEMARK APPLICATION Ref. No. LAR08-061T

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| In re Trademark Registration No.: 3,811,074 Filed: May 13, 2009 Mark: LOVE IS FOREVER (stylized) | |
|--|--|
| L.A. GEM AND JEWELRY DESIGN, INC., | Cancellation No. 92060328 |
| Petitioner, | DECLARATION OF MILORD A. |
| v | KESHISHIAN IN SUPPORT OF PETITIONER'S MOTION TO COMPEL |
| SOUKI MANUFACTURING, INC. | DISCOVERY RESPONSES AND TEST THE SUFFICIENCY OF RESPONSES TO |
| Respondent. | REQUESTS FOR ADMISSION; REQUEST TO SUSPEND THE TRIAL |
| | SCHEDULE |

- I, Milord A. Keshishian, hereby declare as follows:
- 1. I am an attorney duly licensed to practice before this Court and am a principal of Milord & Associates, P.C., counsel of record for Petitioner LA GEM & JEWELRY DESIGN, INC. ("LA Gem").
- 2. Attached hereto as Exhibit A is a true and correct copy of LA Gem's first set of Interrogatories served on Respondent SOUKI MANUFACTURING, INC. ("Respondent") on March 11, 2016.
- 3. Attached hereto as Exhibit B is a true and correct copy of LA Gem's first set of Requests for Production served on Respondent on March 11, 2016.
- 4. Attached hereto as Exhibit C is a true and correct copy of LA Gem's first set of Requests for Admission served on Respondent on March 11, 2016.

5. Attached hereto as Exhibit D is a true and correct copy of Respondent's responses to

Petitioner's first set of Interrogatories, which are dated April 7, 2016.

6. Attached hereto as Exhibit E is a true and correct copy of Respondent's responses to

Petitioner's first set of Requests for Production, which are dated April 7, 2016.

7. Attached hereto as Exhibit F is a true and correct copy of Respondent's responses to

Petitioner's first set of Requests for Admission, which are dated April 7, 2016.

8. Attached hereto as Exhibit G is a true and correct copy of Petitioner's June 3, 2016 meet

and confer letter which was sent to Respondent via email and international mail.

9. To date, Respondent has failed to respond to Petitioner's June 3, 2016 letter and has

failed to provide supplemental responses or any documents.

10. To date, Respondent has also failed to provide Initial Disclosures and has failed to

provide his Initial Production.

11. On multiple occasions, this Board has requested Respondent to engage counsel, which

Respondent has failed to do.

I declare under penalty of perjury under the laws of the United States that the foregoing is

true and correct.

Executed on this 24th day of August, 2016, in Los Angeles, California.

/s/ Milord A. Keshishian

Milord A. Keshishian

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on August 25, 2016, I caused a true and correct copy of the foregoing DECLARATION OF MILORD A. KESHISHIAN IN SUPPORT OF PETITIONER'S MOTION TO COMPEL DISCOVERY RESPONSES AND TEST THE SUFFICIENCY OF RESPONSES TO REQUESTS FOR ADMISSION; REQUEST TO SUSPEND THE TRIAL SCHEDULE to be sent via email, to Registrant's Correspondence of Record as follows:

Souki Manufacturing, Inc. 326-6 Sakamoto-cho Hodogaya-ku, Yokohama-shi Kanagawa 240-0043 Japan

Email: mina-csj@nifty.com

/Milord A. Keshishian/ Milord A. Keshishian 10517 West Pico Boulevard Los Angeles, CA 90064 Telephone: (310) 226-7878

Facsimile: (310) 226-7879

TRADEMARK APPLICATION Ref. No. LAR08-061T

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| In re Trademark Registration No.: 3,811,074 Filed: May 13, 2009 Marky LOVE IS FOREVER (atriliand) | |
|---|--|
| Mark: LOVE IS FOREVER (stylized) | |
| L.A. GEM AND JEWELRY DESIGN, INC., | Cancellation No. 92060328 |
| Petitioner, | |
| v. | PETITIONER L.A. GEM'S FIRST SET OF INTERROGATORIES TO RESPONDENT SOUKI MANUFACTURING, INC. |
| SOUKI MANUFACTURING, INC., | |
| Respondent. | |
| \ | |

REQUESTING PARTY: Petitioner L.A. GEM & JEWELRY DESIGN, INC.

RESPONDING PARTY: Registrant SOUKI MANUFACTURING, INC.

SET NO.: One

Pursuant to 37 C.F.R. § 2.120 and the Federal Rule of Civil Procedure 30, Petitioner L.A. GEM AND JEWELRY DESIGN, INC. ("L.A. Gem") requests that Respondent SOUKI MANUFACTURING, INC. ("Souki") answer each of the Interrogatories set forth below, fully, separately, and in writing within thirty (30) days from the date of the service of these Requests.

INSTRUCTIONS AND DEFINITIONS

- A. In responding to these Interrogatories, the following definitions apply:
- 1. The terms "YOU" and "YOUR" mean and include SOUKI MANUFACTURING, INC., and any and all of its respective agents, employees, attorneys, representatives, affiliates, consultants, subsidiaries, affiliates, shareholders, officers, executives, predecessors, successors, and all persons either acting or purporting to act on its behalf.
- 2. The phrase "LOVE IS FOREVER mark" means the term "LOVE IS FOREVER" used as a name, trademark, service mark, or design mark either alone or in conjunction with any other word(s), design(s), or symbol(s), and printed or displayed in any font or style of type or in writing or drawing in connection with goods and services listed in International Class 014, specifically key rings of precious metal; ornaments, namely, earrings precious metal insignias, precious metal badges, precious metal medals, tiepins, necklaces, bracelets, pendants, jewelry brooches, medals, rings to wear on finger, medallions; cuff links, clocks and watches, namely, wristwatches, table clocks, watches for carrying in pockets, clocks for vehicles, stop watches, wall clocks and alarm clocks.
- 3. The phrase "USE IN COMMERCE" shall have the same meaning as ascribed to it pursuant to 15 U.S.C. § 1227.
- 4. The term "DOCUMENT" has the broadest meaning that can be ascribed to it pursuant to 37 C.F.R. § 2.120 and the Federal Rules of Civil Procedure and includes, without limitation, information stored on, or which can be reproduced from, any magnetic, optical or other tangible medium of express, regardless of how encoded or otherwise fixed, including email messages.
- 5. The terms "PERSON" and "PERSONS" shall mean and include any natural person, partnership, corporation or other form of legal entity.
- 6. The terms "and" and "or" shall be construed conjunctively or disjunctively as necessary to make the request inclusive rather than exclusive.
- 7. The terms "EVIDENCE" and "EVIDENCING" shall mean and include: referring to, pertaining to, being relevant to, including, memorializing, reflecting, embodying, containing,

constituting, identifying, stating, concerning, supporting, refuting, proving, disproving, and negating.

- 8. The terms "IDENTITY" and "IDENTIFY," when used with respect to a person, shall mean to state the present or last known full name, all previous and registered and/or operating names, if any, present or last known business and residential addresses and telephone numbers, and, if applicable, the nature of the business entity or organization.
- 9. The terms "IDENTITY" and "IDENTIFY," when used with respect to a document, shall mean to state the date the document was prepared or created, its author, a summary of its contents, its length, the recipients of the document, and the present custodian of the document and location of any copies of the document.
- 10. The terms "IDENTITY" and "IDENTIFY," when used with respect to a date, shall mean to state the exact day, month and year. If you cannot furnish an exact date in response to any of the following interrogatories, after exercising due diligence to secure the information necessary to do so, you are required to provide an estimated date to the extent possible specifying the basis on which the estimate is made, and, if possible, the upper or lower boundaries of the estimate.
- B. Each interrogatory hereinafter set forth not only calls for the knowledge and information in your possession, but also calls for all knowledge and information that is available to you by reasonable inquiry, including inquiry of your representatives and attorneys.
- C. If you cannot answer any of the following interrogatories in full, after exercising due diligence to secure the information necessary to do so, answer to the extent possible, specifying which portions of the interrogatory you are unable to answer, and state whatever information or knowledge you have concerning the unanswered portion.
- D. In the event that any interrogatory herein requires the identification of an oral communication or document withheld under a claim of privilege, please provide the following information with respect to each oral communication or document:
- E. In the event that any document requested herein is to be withheld under a claim of privilege, please provide the following information with respect to each such document:

- 1. The general subject matter of the oral communication or the document, and the place and approximate date it was communicated, prepared, or created;
- 2. The name and address of each person who was present during any part of the oral communication, or who prepared, created, received, or examined the document or a copy thereof;
- The name and address of the person who presently has possession or custody of the document; and
- 4. The type of privilege claimed.

INTERROGATORIES

INTERROGATORY NO. 1.:

IDENTIFY and describe in detail the process through which YOU or YOUR employees, agents, or any other PERSONs at your direction, came up with or began using the mark LOVE IS FOREVER.

INTERROGATORY NO. 2.:

IDENTIFY each trademark search, clearance search, investigation or other inquiry conducted by YOU or on YOUR behalf to determine the availability of the LOVE IS FOREVER mark for each of YOUR goods, including the date each search was conducted and the PERSON(s) most knowledgeable about each search, investigation or inquiry.

INTERROGATORY NO. 3.:

State the date of first USE IN COMMERCE in the United States of YOUR LOVE IS FOREVER mark, and the circumstances surrounding such first USE IN COMMERCE in the United States.

INTERROGATORY NO. 4.:

State the date of first use in interstate commerce in the United States of YOUR LOVE IS FOREVER mark, and the circumstances surrounding such first use in interstate commerce in the United States.

INTERROGATORY NO. 5.:

What steps did YOU take following YOUR trademark application to develop the goods sold or offered for sale in connection with YOUR LOVE IS FOREVER mark in the United States?

INTERROGATORY NO. 6.:

After obtaining registration for the LOVE IS FOREVER mark in the United States, did YOU ever submit an affidavit or declaration of use in commerce?

INTERROGATORY NO. 7.:

IDENTIFY and describe in detail any product or service research or development, including market research, studies, or product testing conducted by YOU or YOUR employees, agents, or any other PERSONs at your direction, pertaining to USE IN COMMERCE of the LOVE IS FOREVER mark in the United States.

INTERROGATORY NO. 8.:

IDENTIFY and describe in detail all facts which constitute, show, or reflect YOUR bona fide intent to use the LOVE IS FOREVER mark in commerce in the United States prior to May 13, 2009.

INTERROGATORY NO. 9.:

IDENTIFY each product YOU have offered for sale, currently offer for sale, or plan to offer for sale in the United States in connection with the LOVE IS FOREVER mark.

INTERROGATORY NO. 10.:

With regard to any product(s) you planned to offer for sale, did YOU ever discuss any potential features of the proposed product(s) with anyone or any PERSON?

INTERROGATORY NO. 11.:

With regard to any product(s) YOU planned to offer for sale, did you ever create physical samples, mockup or prototypes of the products?

INTERROGATORY NO. 12.:

IDENTIFY any steps YOU have taken or are taking to acquire distributors for the product, including merchandising meetings, meetings with buyers, and/or consultations with

potential customers.

INTERROGATORY NO. 13.:

IDENTIFY the past, current, and future wholesale and/or retail price of each of YOUR goods sold or planned to be sold under the LOVE IS FOREVER mark in the United States.

INTERROGATORY NO. 14.:

Describe each means by which YOU advertise, market, or promote, or have advertised, marketed, or promoted the sale of YOUR goods under the LOVE IS FOREVER mark in the United States, including the types of media used.

INTERROGATORY NO. 15.:

IDENTIFY each trade show at which YOU have advertised goods under and/or in connection with the LOVE IS FOREVER mark, and provide the dates and locations for each such trade show.

INTERROGATORY NO. 16.:

IDENTIFY each domain-name registration and associated web page(s) or web sites that refer or relate in any way to YOUR LOVE IS FOREVER mark, or goods sold under YOUR LOVE IS FOREVER mark.

INTERROGATORY NO. 17.:

IDENTIFY each PERSON that is, or has been, responsible or who has the most knowledge concerning the advertising, marketing, or promotion of YOUR goods under the LOVE IS FOREVER mark in the United States.

INTERROGATORY NO. 18.:

Describe the demographics of the customers and prospective customers for each of YOUR goods advertised, sold, and/or intended to be sold in the United States under the LOVE IS FOREVER mark.

INTERROGATORY NO. 19.:

For each of YOUR goods, IDENTIFY the volume of sales, in terms of dollars, derived from each of YOUR goods sold in the United States under the LOVE IS FOREVER mark in the past ten (10) years.

INTERROGATORY NO. 20.:

For each of YOUR goods, IDENTIFY the number of units sold in the United States under the LOVE IS FOREVER mark in the past ten (10) years.

INTERROGATORY NO. 21.:

IDENTIFY representative packaging or labeling applied, affixed or otherwise used in connection with the sale, or offering of sale, of each of YOUR goods under the LOVE IS FOREVER mark in the United States, including labels, tags, stickers, containers, or other items.

INTERROGATORY NO. 22.:

IDENTIFY every manufacturer that you used to create packaging used in connection with the sale, or offering of sale, of each of YOUR goods under the LOVE IS FOREVER mark in the United States, including the labels, tags, stickers, containers or other forms of packaging.

INTERROGATORY NO. 23.:

IDENTIFY, by stating the name, address and account representative, all manufacturers, distributors, wholesalers, retailers, and/or other businesses, organizations, entities or PERSONs that produce, have produced, sell, or have sold YOUR goods in connection with the LOVE IS FOREVER mark in the United States.

INTERROGATORY NO. 24.:

IDENTIFY each document evidencing your USE IN COMMERCE of the LOVE IS FOREVER mark in connection with goods in International Class 014, including key rings of precious metal; ornaments, namely, earrings, and precious metal insignias, precious metal badges, precious metal medals, tiepins, necklaces, bracelets, pendants, jewelry brooches, medals, rings to wear on ringer, medallions; cuff links, clocks and watches, namely, wristwatches, table clocks, watches for carrying in pockets, clocks for vehicles, stop watches, wall clocks, alarm clocks as listed in YOUR registration.

INTERROGATORY NO. 25.:

IDENTIFY all business plans referencing your intent to USE IN COMMERCE of the LOVE IS FOREVER mark in the United States in connection with goods in International Class

014, including key rings of precious metal; ornaments, namely, earrings, precious metal insignias, precious metal badges, precious metal medals, tiepins, necklaces, bracelets, pendants, jewelry brooches, medals, rings to wear on finger, medallions; cuff links; clocks and watches, namely, wristwatches, table clocks, watches for carrying in pockets, clocks for vehicles, stop watches, wall clocks, alarm clocks as listed in YOUR registration.

INTERROGATORY NO. 26.:

IDENTIFY each document evidencing your USE IN COMMERCE of the LOVE IS FOREVER mark in the United States in connection with goods in International Class 014, including key rings of precious metal; ornaments, namely, earrings, precious metal insignias, precious metal badges, precious metal medals, tiepins, necklaces, bracelets, pendants, jewelry brooches, medals, rings to wear on finger, medallions; cuff links; clocks and watches, namely, wristwatches, table clocks, watches for carrying in pockets, clocks for vehicles, stop watches, wall clocks, alarm clocks as listed in YOUR registration.

INTERROGATORY NO. 27.:

Describe in detail the channels of trade for each of YOUR goods advertised, sold, and/or intended to be advertised or sold in the United States under the LOVE IS FOREVER mark.

INTERROGATORY NO. 28.:

State YOUR total annual expenses incurred in connection with the marketing, advertising, and promotion of YOUR goods under the LOVE IS FOREVER mark for each year from 2008 to the present.

INTERROGATORY NO. 29.:

IDENTIFY YOUR anticipated expenditures and budgetary allocation for the manufacture, marketing, and sale of goods under YOUR LOVE IS FOREVER mark in the United States for each year from 2008 to the present.

INTERROGATORY NO. 30.:

IDENTIFY each state in the United States in which YOUR goods have been sold or intend to be sold under the LOVE IS FOREVER mark in the past ten (10) years.

INTERROGATORY NO. 31.:

IDENTIFY each product and/or device currently sold or intended to be sold by YOU under the LOVE IS FOREVER mark in the United States, including the manufactures of each product, the type and purpose of each product, the brand name under which each product is sold or intended to be sold, and the price for each product.

INTERROGATORY NO. 32.:

IDENTIFY all YOUR efforts to police and enforce your alleged rights in the LOVE IS FOREVER mark through cease and desist letters, legal action, proceedings, arbitration, or mediation.

INTERROGATORY NO. 33.:

State whether YOU have ever discontinued use, in any geographic area or any channel of distribution, in United States commerce of the LOVE IS FOREVER mark on or in connection with any of your goods during the past ten (10) years.

INTERROGATORY NO. 34.:

State whether YOU have ever discontinued, in any geographic area or any channel of distribution, in United States commerce the manufacture or sale of any goods in connection with the LOVE IS FOREVER mark during the past ten (10) years.

INTERROGATORY NO. 35.:

If use of the LOVE IS FOREVER mark has been continuous since the date it was first used, IDENTIFY the records by which such continuous use may be established.

INTERROGATORY NO. 36.:

State the date and describe the circumstances under which YOU first learned of L.A. Gem's mark LOVE IS FOREVER and IDENTIFY all documents and things relating thereto.

INTERROGATORY NO. 37.:

Did YOUR knowledge of L.A. Gem's right to use the mark LOVE IS FOREVER influence YOU to take any action? If so, indicate the nature of the action and the date on which the action was taken.

INTERROGATORY NO. 38.:

IDENTIFY each PERSON whom YOU believe to have knowledge of facts relevant to any issue in this proceeding and describe the issues upon which each PERSON has knowledge.

INTERROGATORY NO. 39.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on key rings of precious metal in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of key rings of precious metal using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 40.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on earrings in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of earrings using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 41.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on precious metal insignias in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of precious metal insignias using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 42.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on precious metal badges in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark

by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of precious metal badges using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 43.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on precious metal medals in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of precious metal medals using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 44.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on tiepins in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of tiepins using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 45.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on necklaces in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of necklaces using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 46.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on bracelets in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in

commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of bracelets using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 47.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on pendants in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of pendants using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 48.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on jewelry brooches in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of jewelry brooches using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 49.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on medals in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of medals using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 50.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on rings to wear on finger in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in

commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of rings to wear on finger using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 51.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on medallions in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of medallions using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 52.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on cuff links in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of cuff links using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 53.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on clocks in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of clocks using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 54.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on watches in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce,

including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of watches using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 55.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on wristwatches in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of wristwatches using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 56.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on table clocks in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of table clocks using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 57.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on watches for carrying in pockets in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of watches for carrying in pockets using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 58.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on clocks for vehicles in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in

commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of clocks for vehicles using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 59.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on stop watches in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of stop watches using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 60.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on wall clocks in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of wall clocks using the LOVE IS FOREVER mark on or before May 13, 2009.

INTERROGATORY NO. 61.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on alarm clocks in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use;

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and all sales made in the United States of alarm clocks using the LOVE IS FOREVER mark on or before May 13, 2009.

Dated: March 11, 2016

MILORD & ASSOCIATES, P.C.

Milord A. Keshishian, Esq. Attorneys for Petitioner

L.A. GEM AND JEWELRY DESIGN, INC.

10517 West Pico Boulevard Los Angeles, CA 90064

Telephone: (310) 226-7878 Facsimile: (310) 226-7879

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on March 11, 2016, I caused a true and correct copy of the foregoing **PETITIONER L.A. GEM'S FIRST SET OF INTERROGATORIES TO RESPONDENT SOUKI MANUFACTURING, INC.** to be sent via electronic mail, to Respondent's Correspondence of Record as follows:

Souki Manufacturing, Inc. 326-6 Sakamoto-cho Hodogaya-ku, Yokohama-shi Kanagawa 240-0043 Japan

Email: mina-csj@nifty.com

/Milord A. Keshishian/

Milord A. Keshishian Attorneys for Petitioner

L.A. GEM AND JEWELRY DESIGN, INC.

10517 West Pico Boulevard Los Angeles, CA 90064 Telephone: (310) 226-7878

Facsimile: (310) 226-7879

TRADEMARK APPLICATION Ref. No. LAR08-061T

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| In re Trademark Registration No.: 3,811,074 Filed: May 13, 2009 Mark: LOVE IS FOREVER (stylized) | |
|--|---|
| L.A. GEM AND JEWELRY DESIGN, INC., | Cancellation No. 92060328 |
| Petitioner, | |
| v. | PETITIONER L.A. GEM'S FIRST SET OF REQUESTS FOR PRODUCTION TO |
| SOUKI MANUFACTURING, INC., | RESPONDENT SOUKI MANUFACTURING, INC. |
| Respondent. | |
| | |
| | |

REQUESTING PARTY: Petitioner L.A. GEM & JEWELRY DESIGN, INC.

RESPONDING PARTY: Registrant SOUKI MANUFACTURING, INC.

SET NO.: One

Pursuant to 37 C.F.R. § 2.120 and the Federal Rule of Civil Procedure 34, Petitioner L.A. GEM AND JEWELRY DESIGN, INC. ("L.A. Gem") requests that Respondent SOUKI MANUFACTURING, INC. ("Souki") answer each of the Requests for Production set forth below, fully, separately, and in writing within thirty (30) days from the date of the service of this Request.

INSTRUCTIONS AND DEFINITIONS

- A. In responding to these Requests for Production, the following definitions apply:
- 1. The terms "YOU" and "YOUR" mean and include SOUKI MANUFACTURING, INC., and any and all of its respective agents, employees, attorneys, representatives, affiliates, consultants, subsidiaries, affiliates, shareholders, predecessors, successors, and all persons either acting or purporting to act on its behalf.
- 2. The phrase "LOVE IS FOREVER mark" means the term "LOVE IS FOREVER" used as a name, trademark, service mark, or design mark either alone or in conjunction with any other word(s), design(s), or symbol(s), and printed or displayed in any font or style of type or in writing or drawing in connection with goods and services listed in International Class 014, specifically key rings of precious metal; ornaments, namely, earrings precious metal insignias, precious metal badges, precious metal medals, tiepins, necklaces, bracelets, pendants, jewelry brooches, medals, rings to wear on finger, medallions; cuff links, clocks and watches, namely, wristwatches, table clocks, watches for carrying in pockets, clocks for vehicles, stop watches, wall clocks and alarm clocks.
- 3. The phrase "USE IN COMMERCE" shall have the same meaning as ascribed to it pursuant to 15 U.S.C. § 1227.
- 4. The term "DOCUMENT" has the broadest meaning that can be ascribed to it pursuant to 37 C.F.R. § 2.120 and the Federal Rules of Civil Procedure and includes, without limitation, information stored on, or which can be reproduced from, any magnetic, optical or other tangible medium of express, regardless of how encoded or otherwise fixed, including email messages.
- 5. The terms "PERSON" and "PERSONS" shall mean and include any natural person, partnership, corporation or other form of legal entity.
- 6. The terms "and" and "or" shall be construed conjunctively or disjunctively as necessary to make the request inclusive rather than exclusive.
- 7. The terms "EVIDENCE" and "EVIDENCING" shall mean and include: referring to, pertaining to, being relevant to, including, memorializing, reflecting, embodying, containing,

constituting, identifying, stating, concerning, supporting, refuting, proving, disproving, and negating.

- B. Please produce all documents called for herein in the present and existing condition, as well as any and all copies or duplicate originals of the documents which bear any mark or notation not present in the original.
- C. The documents sought by these Requests include documents within your possession, custody or control, as well as documents within the possession, custody or control of any of your agents, representatives, consultants, advisers, employees, accountants, attorneys, or persons acting on your behalf.
- D. In the event that any document requested herein is to be withheld under a claim of privilege, please provide the following information with respect to each such document:
 - the type of document, its general subject matter and the place and approximate date it was prepared or created;
 - the name and address of each person who prepared or crated the document and the name and address of each other person who received or examined the document or a copy thereof;
 - 3. the name and address of the person who presently has possession or custody of the document;
 - 4. the type of privilege claimed;
 - a statement of the circumstances which bear on whether the claim or privilege is appropriate and whether the privilege or claim extends to all or just part of the document; and
 - 6. the number of each specific document request to which the withheld document is responsive.
- E. Documents produced for inspection shall be organized and labeled to correspond with the categories in these Requests, or produced as they are kept in the usual course of business.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1.:

All DOCUMENTs which constitute promotional material, including but not limited to catalogues, brochures, flyers, posters, sales sheets, coupons, direct mailers, price lists, posters, vouchers, websites, social media, online marketing firms, publicity releases and/or other advertisements distributed by YOU which depict, refer, or relate to the LOVE IS FOREVER mark used in connection with YOUR goods in United States commerce within the last ten (10) years.

REQUEST FOR PRODUCTION NO. 2.:

All DOCUMENTs which constitute promotional material, including but not limited to catalogues, brochures, flyers, posters, sales sheets, coupons, direct mailers, price lists, posters, vouchers, websites, social media, online marketing firms, publicity releases and/or other advertisements distributed by YOU which depict, refer, or relate to the LOVE IS FOREVER mark used in connection with YOUR goods within the last ten (10) years.

REQUEST FOR PRODUCTION NO. 3.:

All DOCUMENTs which identify the geographic markets in which each such promotional material identified in response to Request No. 1 has been used or circulated by YOU, and the consumers targeted by each such promotional material.

REQUEST FOR PRODUCTION NO. 4.:

All DOCUMENTs relating to business plans, proposals, and any other efforts by YOU to sell or offer to sell products in connection with the LOVE IS FOREVER mark in United States commerce.

REQUEST FOR PRODUCTION NO. 5.:

All DOCUMENTs relating to business plans, proposals, and any other efforts by YOU to sell or offer to sell products in connection with the LOVE IS FOREVER mark in commerce.

REQUEST FOR PRODUCTION NO. 6.:

All DOCUMENTs pertaining to investigations, consumer or market-research studies,

surveys, polls, or other inquiries, conducted by or on behalf of YOU that refers or relates to goods sold in connection with the LOVE IS FOREVER mark in the United States.

REQUEST FOR PRODUCTION NO. 7.:

All DOCUMENTs pertaining to investigations, consumer or market-research studies, surveys, polls, or other inquiries, conducted by or on behalf of YOU that refers or relates to goods sold in connection with the LOVE IS FOREVER mark.

REQUEST FOR PRODUCTION NO. 8.:

All DOCUMENTs relating to contracts with any advertising agency or marketing agency relating to the sale of each product in connection with YOUR LOVE IS FOREVER mark in the United States.

REQUEST FOR PRODUCTION NO. 9.:

All DOCUMENTs relating to contracts with any advertising agency or marketing agency relating to the sale of each product in connection with YOUR LOVE IS FOREVER mark.

REQUEST FOR PRODUCTION NO. 10.:

All DOCUMENTs which constitute, show, or reflect YOUR gross revenue from sales of products in connection with the LOVE IS FOREVER mark in the United States for each of the last ten (10) years.

REQUEST FOR PRODUCTION NO. 11.:

All DOCUMENTs which constitute, show, or reflect YOUR gross revenue from sales of products in connection with the LOVE IS FOREVER mark in the last ten (10) years.

REQUEST FOR PRODUCTION NO. 12.:

All DOCUMENTs referring or relating to costs incurred by YOU for manufacturing, distributing, importing, exporting, or selling products in connection with the LOVE IS FOREVER mark in the United States for each of the last ten (10) years.

REQUEST FOR PRODUCTION NO. 13.:

All DOCUMENTs referring or RELATING TO costs incurred by YOU for manufacturing, distributing, importing, exporting, or selling products in connection with the

LOVE IS FOREVER mark for each of the last ten (10) years.

REQUEST FOR PRODUCTION NO. 14.:

All DOCUMENTs which constitute, show, or reflect financial reports or summaries resulting from the sale of goods in connection with the LOVE IS FOREVER mark in the United States for each of the last ten (10) years.

REQUEST FOR PRODUCTION NO. 15.:

All DOCUMENTs which constitute, show, or reflect financial reports or summaries resulting from the sale of goods in connection with the LOVE IS FOREVER mark for each of the last ten (10) years.

REQUEST FOR PRODUCTION NO. 16.:

All DOCUMENTs in their native format (e.g. msg, emlx, CAD, PowerPoint, Word, Adobe Illustrator, or Draw), which constitute, show, or reflect any COMMUNICATION between YOU and any PERSON relating to the goods sold in connection with the LOVE IS FOREVER mark in the United States in the last ten (10) years.

REQUEST FOR PRODUCTION NO. 17.:

All DOCUMENTs in their native format (e.g. msg, emlx, CAD, PowerPoint, Word, Adobe Illustrator, or Draw), which constitute, show, or reflect any COMMUNICATION between YOU and any PERSON relating to the goods sold in connection with the LOVE IS FOREVER mark in the last ten (10) years.

REQUEST FOR PRODUCTION NO. 18.:

All DOCUMENTs in their native format (e.g. msg, emlx, CAD, PowerPoint, Word, Adobe Illustrator, or Draw), which constitute, show, or reflect any communication between YOU and YOUR supplier, distributor, designer, or vendor relating to goods sold in connection with the LOVE IS FOREVER mark in the United States in the last ten (10) years.

REQUEST FOR PRODUCTION NO. 19.:

All DOCUMENTs in their native format (e.g. msg, emlx, CAD, PowerPoint, Word, Adobe Illustrator, or Draw), which constitute, show, or reflect any communication between YOU and YOUR supplier, distributor, designer, or vendor relating to goods sold in connection

with the LOVE IS FOREVER mark in the last ten (10) years.

REQUEST FOR PRODUCTION NO. 20.:

All DOCUMENTs in their native format (e.g. msg, emlx, CAD, PowerPoint, Word, Adobe Illustrator, or Draw), which constitute, show, or reflect any communication or correspondence relating to the creation of the goods sold in connection with the LOVE IS FOREVER mark in the United States in the last ten (10) years.

REQUEST FOR PRODUCTION NO. 21.:

All DOCUMENTs in their native format (e.g. msg, emlx, CAD, PowerPoint, Word, Adobe Illustrator, or Draw), which constitute, show, or reflect any communications or correspondence relating to the creation of the goods sold in connection with the LOVE IS FOREVER mark in the last ten (10) years.

REQUEST FOR PRODUCTION NO. 22.:

All computer files containing images of the goods YOU sold or anticipated to sell in connection with the LOVE IS FOREVER mark in the United States in the last ten (10) years, including images of mock-ups, samples, and/or prototypes.

REQUEST FOR PRODUCTION NO. 23.:

All computer files containing images of the goods YOU sold or anticipated to sell in connection with the LOVE IS FOREVER mark in the last ten (10) years, including images of mock-ups, samples, and/or prototypes.

REQUEST FOR PRODUCTION NO. 24.:

All DOCUMENTs relating to the creation, manufacture, purchase, exportation, and/or importation of materials pertaining to the goods YOU sold or anticipated to sell in connection with the LOVE IS FOREVER mark in the United States in the last ten (10) years.

REQUEST FOR PRODUCTION NO. 25.:

All DOCUMENTs relating to the creation, manufacture, purchase, exportation, and/or importation of materials pertaining to the goods YOU sold or anticipated to sell in connection with the LOVE IS FOREVER mark in the last ten (10) years.

REQUEST FOR PRODUCTION NO. 26.:

All DOCUMENTs which constitute, show, or reflect any contracts or agreements relating to the creation, manufacture, purchase, exportation, and/or importation of goods sold or anticipated to be sold in connection with the LOVE IS FOREVER mark in the United States.

REQUEST FOR PRODUCTION NO. 27.:

All DOCUMENTs which constitute, show, or reflect any contracts or agreements relating to the creation, manufacture, purchase, exportation, and/or importation of goods sold or anticipated to be sold in connection with the LOVE IS FOREVER mark.

REQUEST FOR PRODUCTION NO. 28.:

All DOCUMENTs which constitute, show, or reflect the identity of YOUR employees or agents that were involved in marketing, selling, distributing, purchasing, or shipping of goods in connection with the LOVE IS FOREVER mark in the United States.

REQUEST FOR PRODUCTION NO. 29.:

All DOCUMENTs which constitute, show, or reflect the identity of YOUR employees or agents that were involved in marketing, selling, distributing, purchasing, or shipping of goods in connection with the LOVE IS FOREVER mark.

REQUEST FOR PRODUCTION NO. 30.:

All DOCUMENTs which constitute, show, or reflect the shipping or delivery of goods used in connection with the LOVE IS FOREVER mark in the United States.

REQUEST FOR PRODUCTION NO. 31.:

All DOCUMENTs which constitute, show, or reflect the shipping or delivery of goods used in connection with the LOVE IS FOREVER mark.

REQUEST FOR PRODUCTION NO. 32.:

All DOCUMENTs which constitute, show, or reflect any agreements between YOU and any PERSON for the purchase of goods in connection with the LOVE IS FOREVER mark in the United States.

REQUEST FOR PRODUCTION NO. 33.:

All DOCUMENTs which constitute, show, or reflect any agreements between YOU and

any PERSON for the purchase of goods in connection with the LOVE IS FOREVER mark.

REQUEST FOR PRODUCTION NO. 34.:

All DOCUMENTs which constitute, show, or reflect any agreements between YOU and any PERSON for the sale of goods in connection with the LOVE IS FOREVER mark in the United States.

REQUEST FOR PRODUCTION NO. 35.:

All DOCUMENTs which constitute, show, or reflect any agreements between YOU and any PERSON for the sale of goods in connection with the LOVE IS FOREVER mark.

REQUEST FOR PRODUCTION NO. 36.:

All DOCUMENTs which constitute, show, or reflect YOUR communications with any other PERSON regarding the purchase or negotiations to purchase any goods sold in connection with the LOVE IS FOREVER mark in the United States.

REQUEST FOR PRODUCTION NO. 37.:

All DOCUMENTs which constitute, show, or reflect YOUR communications with any other PERSON regarding the purchase or negotiations to purchase any goods sold in connection with the LOVE IS FOREVER mark.

REQUEST FOR PRODUCTION NO. 38.:

All DOCUMENTs which constitute, show, or reflect all shipping activity, including, without limitation, freight DOCUMENTs, bills of sale, bills of lading, packing slips, etc. that refer to the shipping or other transportation of goods sold in connection with the LOVE IS FOREVER mark in the United States.

REQUEST FOR PRODUCTION NO. 39.:

All DOCUMENTs which constitute, show, or reflect all shipping activity, including, without limitation, freight DOCUMENTs, bills of sale, bills of lading, packing slips, etc. that refer to the shipping or other transportation of goods sold in connection with the LOVE IS FOREVER mark.

REQUEST FOR PRODUCTION NO. 40.:

All DOCUMENTs which relate to the importation of the goods sold in connection with

the LOVE IS FOREVER mark into the United States.

REQUEST FOR PRODUCTION NO. 41.:

All DOCUMENTs which constitute, show, or reflect all other forms or other

information YOU were required to complete and maintain by the United States government

relating to the importation of the goods sold in connection with the LOVE IS FOREVER mark.

REQUEST FOR PRODUCTION NO. 42.:

All DOCUMENTs which constitute, show, or reflect YOUR bona fide intent to use the

LOVE IS FOREVER mark in commerce in the United States prior to May 13, 2009.

REQUEST FOR PRODUCTION NO. 43.:

All DOCUMENTs which constitute, show, or reflect all United States Customs forms or

other DOCUMENTs that refer to the importation by YOU of goods sold in connection with the

LOVE IS FOREVER mark.

REQUEST FOR PRODUCTION NO. 44.:

All DOCUMENTs and things referred to in YOUR answers to interrogatories served by

Petitioner.

REQUEST FOR PRODUCTION NO. 45.:

All DOCUMENTs and things referred to in YOUR Rule 26 Disclosures.

Dated: March 11, 2016

MILORD & ASSOCIATES, P.C.

/Milord A. Keshishian/

Milord A. Keshishian, Esq.

Attorneys for Petitioner

L.A. GEM AND JEWELRY DESIGN, INC.

10517 West Pico Boulevard

Los Angeles, CA 90064

Telephone: (310) 226-7878

Facsimile: (310) 226-7879

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on March 11, 2016, I caused a true and correct copy of the foregoing PETITIONER L.A. GEM'S FIRST SET OF REQUESTS FOR PRODUCTION TO RESPONDENT SOUKI MANUFACTURING, INC. to be sent via electronic mail, to Respondent's Correspondence of Record as follows:

Souki Manufacturing, Inc. 326-6 Sakamoto-cho Hodogaya-ku, Yokohama-shi Kanagawa 240-0043 Japan Email: mina-csj@nifty.com

Mil # /Milord A. Keshishian/ Milord A. Keshishian Attorneys for Petitioner L.A. GEM AND JEWELRY DESIGN, INC.

10517 West Pico Boulevard Los Angeles, CA 90064 Telephone: (310) 226-7878 Facsimile: (310) 226-7879

TRADEMARK APPLICATION Ref. No. LAR08-061T

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| Cancellation No. 92060328 |
|--|
| PETITIONER L.A. GEM'S FIRST SET OF REQUESTS FOR ADMISSIONS TO RESPONDENT SOUKI MANUFACTURING, INC. |
| |

REQUESTING PARTY: Petitioner L.A. GEM & JEWELRY DESIGN, INC.

RESPONDING PARTY: Registrant SOUKI MANUFACTURING, INC.

SET NO.: One

Pursuant to 37 C.F.R. § 2.120 and the Federal Rule of Civil Procedure 36, Petitioner L.A. GEM AND JEWELRY DESIGN, INC. ("L.A. Gem") requests that Respondent SOUKI MANUFACTURING, INC. ("Souki") admit the truth of the Requests for Admissions set forth below, fully, separately, and in writing within thirty (30) days from the date of the service of this Request.

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INSTRUCTIONS AND DEFINITIONS

- A. In responding to these Requests for Admission, the following definitions apply:
- 1. The terms "YOU" and "YOUR" mean and include SOUKI MANUFACTURING, INC., and any and all of its respective agents, employees, attorneys, representatives, affiliates, consultants, subsidiaries, affiliates, shareholders, predecessors, successors, and all persons either acting or purporting to act on its behalf.
- 2. The phrase "LOVE IS FOREVER mark" means the term "LOVE IS FOREVER" used as a name, trademark, service mark, or design mark either alone or in conjunction with any other word(s), design(s), or symbol(s), and printed or displayed in any font or style of type or in writing or drawing in connection with goods and services listed in International Class 014, specifically key rings of precious metal; ornaments, namely, earrings precious metal insignias, precious metal badges, precious metal medals, tiepins, necklaces, bracelets, pendants, jewelry brooches, medals, rings to wear on finger, medallions; cuff links, clocks and watches, namely, wristwatches, table clocks, watches for carrying in pockets, clocks for vehicles, stop watches, wall clocks and alarm clocks.
- 3. The phrase "use in commerce" shall have the same meaning as ascribed to it pursuant to 15 U.S.C. § 1227.
- 4. The term "document" has the broadest meaning that can be ascribed to it pursuant to 37 C.F.R. § 2.120 and the Federal Rules of Civil Procedure and includes, without limitation, information stored on, or which can be reproduced from, any magnetic, optical or other tangible medium of express, regardless of how encoded or otherwise fixed, including email messages.
- 5. The terms "person" and "persons" shall mean and include any natural person, partnership, corporation or other form of legal entity.
- 6. The terms "and" and "or" shall be construed conjunctively or disjunctively as necessary to make the request inclusive rather than exclusive.
- B. Each request for admission hereinafter set forth not only calls for the knowledge and information in your possession, but also calls for all knowledge and information that is

- available to you by reasonable inquiry, including inquiry or your representatives and attorneys.
- C. If you cannot answer any of the following requests for admissions in full, after exercising due diligence to secure the information necessary to do so, answer to the extent possible, specifying which portions of the request for admission you are unable to answer and the reason you are unable to answer.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with key rings of precious metal at any time during the last ten years.

REQUEST FOR ADMISSION NO. 2.

Admit that YOU did not advertise or promote key rings of precious metal in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 3.

Admit that YOU did not sell any key rings of precious metal in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 4.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with key rings of precious metal at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 5.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE

IS FOREVER mark in connection with key rings of precious metal prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 6.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to key rings of precious metal in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 7.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with earrings at any time during the last ten years.

REQUEST FOR ADMISSION NO. 8.

Admit that YOU did not advertise or promote earrings in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 9.

Admit that YOU did not sell any earrings in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 10.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with earrings at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 11.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with earrings prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 12.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to earrings in connection with the LOVE IS FOREVER mark in

the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 13.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with precious metal insignias at any time during the last ten years.

REQUEST FOR ADMISSION NO. 14.

Admit that YOU did not advertise or promote precious metal insignias in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 15.

Admit that YOU did not sell any precious metal insignias in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 16.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with precious metal insignias at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 17.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with precious metal insignias prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 18.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to precious metal insignias in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 19.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with precious metal badges at any time during the last ten years.

REQUEST FOR ADMISSION NO. 20.

Admit that YOU did not advertise or promote precious metal badges in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 21.

Admit that YOU did not sell any precious metal badges in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 22.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with precious metal badges at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 23.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with precious metal badges prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 24.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to precious metal badges in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 25.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with precious metal medals at any time during the last ten years.

REQUEST FOR ADMISSION NO. 26.

Admit that YOU did not advertise or promote precious metal medals in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 27.

Admit that YOU did not sell any precious metal medals in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 28.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with precious metal medals at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 29.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with precious metal medals prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 30.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to precious metal medals in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 31.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with tiepins at any time during the last ten years.

REQUEST FOR ADMISSION NO. 32.

Admit that YOU did not advertise or promote tiepins in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 33.

Admit that YOU did not sell any tiepins in connection with the LOVE IS FOREVER

mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 34.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with tiepins at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 35.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with tiepins prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 36.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to tiepins in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 37.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with necklaces at any time during the last ten years.

REQUEST FOR ADMISSION NO. 38.

Admit that YOU did not advertise or promote necklaces in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 39.

Admit that YOU did not sell any necklaces in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 40.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with necklaces at any time during

the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 41.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with necklaces prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 42.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to necklaces in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 43.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with bracelets at any time during the last ten years.

REQUEST FOR ADMISSION NO. 44.

Admit that YOU did not advertise or promote bracelets in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 45.

Admit that YOU did not sell any bracelets in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 46.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with bracelets at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 47.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE

IS FOREVER mark in connection with bracelets prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 48.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to bracelets in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 49.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with pendants at any time during the last ten years.

REQUEST FOR ADMISSION NO. 50.

Admit that YOU did not advertise or promote pendants in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 51.

Admit that YOU did not sell any pendants in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 52.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with pendants at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 53.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with pendants prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 54.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to pendants in connection with the LOVE IS FOREVER mark

in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 55.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with jewelry brooches at any time during the last ten years.

REQUEST FOR ADMISSION NO. 56.

Admit that YOU did not advertise or promote jewelry brooches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 57.

Admit that YOU did not sell any jewelry brooches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 58.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with jewelry brooches at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 59.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with jewelry brooches prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 60.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to jewelry brooches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 61.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with medals at any time during the last ten years.

REQUEST FOR ADMISSION NO. 62.

Admit that YOU did not advertise or promote medals in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 63.

Admit that YOU did not sell any medals in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 64.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with medals at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 65.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with medals prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 66.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to medals in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 67.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with rings to wear on fingers at any time during the last ten years.

REQUEST FOR ADMISSION NO. 68.

Admit that YOU did not advertise or promote rings to wear on fingers in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet,

coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 69.

Admit that YOU did not sell any rings to wear on fingers in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 70.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with rings to wear on fingers at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 71.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with rings to wear on fingers prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 72.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to rings to wear on fingers in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 73.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with medallions at any time during the last ten years.

REQUEST FOR ADMISSION NO. 74.

Admit that YOU did not advertise or promote medallions in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 75.

Admit that YOU did not sell any medallions in connection with the LOVE IS

FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 76.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with medallions at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 77.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with medallions prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 78.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to medallions in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 79.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with cuff links at any time during the last ten years.

REQUEST FOR ADMISSION NO. 80.

Admit that YOU did not advertise or promote cuff links in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 81.

Admit that YOU did not sell any cuff links in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 82.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with cuff links at any time during

the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 83.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with cuff links prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 84.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to cuff links in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 85.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with clocks at any time during the last ten years.

REQUEST FOR ADMISSION NO. 86.

Admit that YOU did not advertise or promote clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 87.

Admit that YOU did not sell any clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 88.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with clocks at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 89.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE

IS FOREVER mark in connection with clocks prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 90.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 91.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with watches at any time during the last ten years.

REQUEST FOR ADMISSION NO. 92.

Admit that YOU did not advertise or promote watches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 93.

Admit that YOU did not sell any watches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 94.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with watches at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 95.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with watches prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 96.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to watches in connection with the LOVE IS FOREVER mark in

the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 97.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with wristwatches at any time during the last ten years.

REQUEST FOR ADMISSION NO. 98.

Admit that YOU did not advertise or promote wristwatches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 99.

Admit that YOU did not sell any wristwatches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 100.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with wristwatches at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 101.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with wristwatches prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 102.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to wristwatches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 103.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with table clocks at any time during the last ten years.

REQUEST FOR ADMISSION NO. 104.

Admit that YOU did not advertise or promote table clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 105.

Admit that YOU did not sell any table clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 106.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with table clocks at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 107.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with table clocks prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 108.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to table clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 109.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with pocket watches at any time during the last ten years.

REQUEST FOR ADMISSION NO. 110.

Admit that YOU did not advertise or promote pocket watches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via

newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 111.

Admit that YOU did not sell any pocket watches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 112.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with pocket watches at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 113.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with pocket watches prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 114.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to pocket watches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 115.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with clocks for vehicles at any time during the last ten years.

REQUEST FOR ADMISSION NO. 116.

Admit that YOU did not advertise or promote clocks for vehicles in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 117.

Admit that YOU did not sell any clocks for vehicles in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 118.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with clocks for vehicles at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 119.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with clocks for vehicles prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 120.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to clocks for vehicles in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 121.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with stopwatches at any time during the last ten years.

REQUEST FOR ADMISSION NO. 122.

Admit that YOU did not advertise or promote stopwatches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 123.

Admit that YOU did not sell any stopwatches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 124.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with stopwatches at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 125.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with stopwatches prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 126.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to stopwatches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 127.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with wall clocks at any time during the last ten years.

REQUEST FOR ADMISSION NO. 128.

Admit that YOU did not advertise or promote wall clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 129.

Admit that YOU did not sell any wall clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 130.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with wall clocks at any time during the last ten years, including without limitation, specific business goals, marketing plans,

operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 131.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with wall clocks prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 132.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to wall clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 133.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with alarm clocks at any time during the last ten years.

REQUEST FOR ADMISSION NO. 134.

Admit that YOU did not advertise or promote alarm clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

REQUEST FOR ADMISSION NO. 135.

Admit that YOU did not sell any alarm clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

REQUEST FOR ADMISSION NO. 136.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with alarm clocks at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

REQUEST FOR ADMISSION NO. 137.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with alarm clocks prior to May 13, 2009.

REQUEST FOR ADMISSION NO. 138.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to alarm clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

Dated: March 11, 2016 MILORD & ASSOCIATES, P.C.

Milord A. Keshishian, Esq.

Attorneys for Petitioner

L.A. GEM AND JEWELRY DESIGN, INC.

10517 West Pico Boulevard

Los Angeles, CA 90064 Telephone: (310) 226-7878

Facsimile: (310) 226-7879

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on March 11, 2016, I caused a true and correct copy of the foregoing PETITIONER L.A. GEM'S FIRST SET OF REQUESTS FOR ADMISSIONS TO RESPONDENT SOUKI MANUFACTURING, INC. to be sent via electronic mail, to Respondent's Correspondence of Record as follows:

Souki Manufacturing, Inc. 326-6 Sakamoto-cho Hodogaya-ku, Yokohama-shi Kanagawa 240-0043 Japan

Email: mina-csj@nifty.com

/Milord A. Keshishian/
Milord A. Keshishian
Attorneys for Petitioner
L.A. GEM AND JEWELRY DESIGN, INC.
10517 West Pico Boulevard

Los Angeles, CA 90064 Telephone: (310) 226-7878 Facsimile: (310) 226-7879

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Plaintiff Trademark:

LOVE IS FOREVER

Serial Number:

86285762

Filing Date:

May 19, 2014

Refusal Issue/Mailing Date:

August 27, 2014

Defendant Trademark:

LOVE IS FOREVER ®

Registration No.:

3811074

Filing Date:

May 13, 2009

Registration Date:

June 29, 2010

Plaintiff

L.A. Gem and Jewlry Design, Inc.

Assigned Attorney

Mr. Milord A. Keshishian

Cancellation No.: 92060328

Defendant

Souki Manufacturing Inc.

Nobuhiko Minaki (Mr.) Representative Director

Trademark Creator, Owner, User

April 07, 2016 JST

Ref number: Souki 160403

RESPONSES OF DEFENDANT FOR INTERROGATORIES

INTERROGATORY NO. 1.:

IDENTIFY and describe in detail the process through which YOU or YOUR employees, agents, or any other PERSONs at your direction, came up with or began using the mark LOVEIS FOREVER.

RESPONSE 1:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

The grounds of this case asserted by Mr. Milord A. Keshishian and member is ABANDONMENT of/by me my trademark, Love is Forever ®, but I have never abandoned as I repeatedly explained since filing this case 11/05/2014 and since I have started to intend to use this trademark, Love is Forever ®.

It is highly antisocial and unwelcome that telling the opposite to the truth trying to make TTAB to believe opposite way to the fact abusing the difficulty of overseas matter to confirm, such as I, defendant, being in Yokohama in Japan as Pro Se no proxy in USA.

So people, even an infant has been highly respectfully recommending you "Mr. Milord A. Keshishian and the member. Go away with high pride, disappear for high respect and your long prosperity not for the wrinkled no tooth old beggar and witch, " I hypothetically has been felt.

Life is short, even you live 100 years old, it is 36,500 days only.

You are professional but I am an amateur in legal matter, and so if you lose, it will ruin yourself and qualification of attorney completely, I feel so. I suppose that is why Madam Catherine M. C. Farrelly had withdrawn wisely smartly from the case and it was appraised by legal matter market, clients and clients-to-be, I think. And it seems that she has been very busy in her legal business since withdrawal.

I think her withdrawal from her case, 92058656, realized/achieved to obtain belief/reliability/supports of her clients, clients-to-be etc, demand of market of legal matter, I think. She did a very effective/fruitful performance, the withdrawal, it obtains the successfulness to achieve/attain/satisfy the legal market demand, I feel. If she moves step by step accordingly from now on her business future is to be so shiny/bright, I feel.

I had sincerely presented the words "I am certain that prosperity is happy to visit you," when she had started to take the procedure to withdraw from 92058656 September 24 or so, 2015 Japan Standard Time.

with morally good persons etc I think.

And if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

INTERROGATORY NO. 2.:

IDENTIFY each trademark search, clearance search, investigation or other inquiry conducted by YOU or on YOUR behalf to determine the availability of the LOVE IS FOREVER mark for each of YOUR goods, including the date each search was conducted and the PERSON(s) most knowledgeable about each search, investigation or inquiry.

RESPONSE 2:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 3.:

State the date of first USE IN COMMERCE in the United States of YOUR LOVE IS FOREVER mark, and the circumstances surrounding such first USE IN COMMERCE in the United States.

RESPONSE 3:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well

accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 4.:

State the date of first use in interstate commerce in the United States of YOUR LOVE IS FOREVER mark, and the circumstances surrounding such first use in interstate commerce in the United States.

RESPONSE 4:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinaster same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 5.:

What steps did YOU take following YOUR trademark application to develop the goods sold or offered for sale in connection with YOUR LOVE IS FOREVER mark in the United States?

RESPONSE 5:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

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Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 6.:

After obtaining registration for the LOVE IS FOREVER mark in the United States, did YOU ever submit an affidavit or declaration of use in commerce?

RESPONSE 6:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS,

MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 7.:

IDENTIFY and describe in detail any product or service research or development, including market research, studies, or product testing conducted by YOU or YOUR employees, agents, or any other PERSONs at your direction, pertaining to USE IN COMMERCE of the LOVE IS FOREVER mark in the United States.

RESPONSE 7:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

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But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 8.:

IDENTIFY and describe in detail all facts which constitute, show, or reflect YOUR bona fide intent to use the LOVE IS FOREVER mark in commerce in the United States prior to May

13, 2009.

RESPONSE 8:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

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But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 9.:

IDENTIFY each product YOU have offered for sale, currently offer for sale, or plan to offer for sale in the United States in connection with the LOVE IS FOREVER mark.

RESPONSE 9:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

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Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 10.:

With regard to any product(s) you planned to offer for sale, did YOU ever discuss any potential features of the proposed product(s) with anyone or any PERSON?

RESPONSE 10:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

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But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 11.:

With regard to any product(s) YOU planned to offer for sale, did you ever create physical samples, mockup or prototypes of the products?

RESPONSE 11:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/

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But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 12.:

IDENTIFY any steps YOU have taken or are taking to acquire distributors for the product, including merchandising meetings, meetings with buyers, and/or consultations with potential customers.

RESPONSE 12:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

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But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 13.:

IDENTIFY the past, current, and future wholesale and/or retail price of each of YOUR goods sold or planned to be sold under the LOVE IS FOREVER mark in the United States.

RESPONSE 13:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

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But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 14.:

Describe each means by which YOU advertise, market, or promote, or have advertised, marketed, or promoted the sale of YOUR goods under the LOVE IS FOREVER mark in the United States, including the types of media used.

RESPONSE 14:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

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But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 15.:

IDENTIFY each trade show at which YOU have advertised goods under and/or in connection with the LOVE IS FOREVER mark, and provide the dates and locations for each such trade show.

RESPONSE 15:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

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But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 16.:

IDENTIFY each domain-name registration and associated web page(s) or web sites that refer or relate in any way to YOUR LOVE IS FOREVER mark, or goods sold under YOUR LOVE IS FOREVER mark.

RESPONSE 16:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

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But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 17.:

IDENTIFY each PERSON that is, or has been, responsible or who has the most knowledge concerning the advertising, marketing, or promotion of YOUR goods under the LOVE IS FOREVER mark in the United States.

RESPONSE 17:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 18.:

Describe the demographics of the customers and prospective customers for each of YOUR goods advertised, sold, and/or intended to be sold in the United States under the LOVE IS FOREVER mark.

RESPONSE 18:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 19.:

For each of YOUR goods, IDENTIFY the volume of sales, in terms of dollars, derived from each of YOUR goods sold in the United States under the LOVE IS FOREVER mark in the past ten (10) years.

RESPONSE 19:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 20.:

For each of YOUR goods, IDENTIFY the number of units sold in the United States under the LOVE IS FOREVER mark in the past ten (10) years.

RESPONSE 20:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 21.:

IDENTIFY representative packaging or labeling applied, affixed or otherwise used in connection with the sale, or offering of sale, of each of YOUR goods under the LOVE IS

FOREVER mark in the United States, including labels, tags, stickers, containers, or other items.

RESPONSE 21:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 22.:

IDENTIFY every manufacturer that you used to create packaging used in connection with the sale, or offering of sale, of each of YOUR goods under the LOVE IS FOREVER mark in the United States, including the labels, tags, stickers, containers or other forms of packaging.

RESPONSE 22:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them

existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 23.:

IDENTIFY, by stating the name, address and account representative, all manufacturers, distributors, wholesalers, retailers, and/or other businesses, organizations, entities or PERSONs that produce, have produced, sell, or have sold YOUR goods in connection with the LOVE IS FOREVER mark in the United States.

RESPONSE 23:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 24.:

IDENTIFY each document evidencing your USE IN COMMERCE of the LOVE IS FOREVER mark in connection with goods in International Class 014, including key rings of precious metal; ornaments, namely, earrings, and precious metal insignias, precious metal badges, precious metal medals, tiepins, necklaces, bracelets, pendants, jewelry brooches, medals, rings to wear on ringer, medallions; cuff links, clocks and watches, namely,

wristwatches, table clocks, watches for carrying in pockets, clocks for vehicles, stop watches, wall clocks, alarm clocks as listed in YOUR registration.

RESPONSE 24:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 25.:

IDENTIFY all business plans referencing your intent to USE IN COMMERCE of the LOVE IS FOREVER mark in the United States in connection with goods in International Class 014, including key rings of precious metal; ornaments, namely, earrings, precious metal insignias, precious metal badges, precious metal medals, tiepins, necklaces, bracelets, pendants, jewelry brooches, medals, rings to wear on finger, medallions; cuff links; clocks and watches, namely, wristwatches, table clocks, watches for carrying in pockets, clocks for vehicles, stop watches, wall clocks, alarm clocks as listed in YOUR registration.

RESPONSE 25:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 26.:

IDENTIFY each document evidencing your USE IN COMMERCE of the LOVE IS FOREVER mark in the United States in connection with goods in International Class 014, including key rings of precious metal; ornaments, namely, earrings, precious metal insignias, precious metal badges, precious metal medals, tiepins, necklaces, bracelets, pendants, jewelry brooches, medals, rings to wear on finger, medallions; cuff links; clocks and watches, namely, wristwatches, table clocks, watches for carrying in pockets, clocks for vehicles, stop watches, wall clocks, alarm clocks as listed in YOUR registration.

RESPONSE 26:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 27.:

Describe in detail the channels of trade for each of YOUR goods advertised, sold, and/or intended to be advertised or sold in the United States under the LOVE IS FOREVER mark.

RESPONSE 27:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

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But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 28.:

State YOUR total annual expenses incurred in connection with the marketing, advertising, and promotion of YOUR goods under the LOVE IS FOREVER mark for each year from 2008 to the present.

RESPONSE 28:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS,

MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 29.:

IDENTIFY YOUR anticipated expenditures and budgetary allocation for the manufacture, marketing, and sale of goods under YOUR LOVE IS FOREVER mark in the United States for each year from 2008 to the present.

RESPONSE 29:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 30.:

IDENTIFY each state in the United States in which YOUR goods have been sold or intend to be sold under the LOVE IS FOREVER mark in the past ten (10) years.

RESPONSE 30:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 31.:

IDENTIFY each product and/or device currently sold or intended to be sold by YOU under the LOVE IS FOREVER mark in the United States, including the manufactures of each product, the type and purpose of each product, the brand name under which each product is sold or intended to be sold, and the price for each product.

RESPONSE 31:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 32.:

IDENTIFY all YOUR efforts to police and enforce your alleged rights in the LOVE IS FOREVER mark through cease and desist letters, legal action, proceedings, arbitration, or mediation.

RESPONSE 32:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 33.:

State whether YOU have ever discontinued use, in any geographic area or any channel of distribution, in United States commerce of the LOVE IS FOREVER mark on or in connection with any of your goods during the past ten (10) years.

RESPONSE 33:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 34.:

State whether YOU have ever discontinued, in any geographic area or any channel of distribution, in United States commerce the manufacture or sale of any goods in connection with the LOVE IS FOREVER mark during the past ten (10) years.

RESPONSE 34:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 35.:

If use of the LOVE IS FOREVER mark has been continuous since the date it was first used, IDENTIFY the records by which such continuous use may be established.

RESPONSE 35:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 36.:

State the date and describe the circumstances under which YOU first learned of L.A. Gem's mark LOVE IS FOREVER and IDENTIFY all documents and things relating thereto.

RESPONSE 36:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by

self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 37.:

Did YOUR knowledge of L.A. Gem's right to use the mark LOVE IS FOREVER influence YOU to take any action? If so, indicate the nature of the action and the date on which the action was taken.

RESPONSE 37:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 38.:

IDENTIFY each PERSON whom YOU believe to have knowledge of facts relevant to any issue in this proceeding and describe the issues upon which each PERSON has knowledge.

RESPONSE 38:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 39.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on key rings of precious metal in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of key rings of precious metal using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 39:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 40.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on earrings in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of earrings using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 40:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 41.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on precious metal insignias in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of precious metal insignias using the LOVE IS

FOREVER mark on or before May 13, 2009.

RESPONSE 41:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 42.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on precious metal badges in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of precious metal badges using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 42:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my

business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 43.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on precious metal medals in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of precious metal medals using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 43:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 44.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on tiepins

in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of tiepins using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 44:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 45.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on necklaces in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of necklaces using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 45:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/

purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 46.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on bracelets in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of bracelets using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 46:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 47.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on pendants in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of pendants using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 47:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 48.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on jewelry brooches in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of jewelry brooches using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 48:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 49.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on medals in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of medals using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 49:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 50.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on rings to wear on finger in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of rings to wear on finger using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 50:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 51.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on medallions in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of medallions using the LOVE IS FOREVER mark on or

before May 13, 2009.

RESPONSE 51:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 52.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on cuff links in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of cuff links using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 52:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my

business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 53.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on clocks in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of clocks using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 53:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 54.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on watches

in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of watches using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 54:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 55.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on wristwatches in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of wristwatches using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 55:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/

purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 56.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on table clocks in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of table clocks using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 56:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 57.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on watches for carrying in pockets in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of watches for carrying in pockets using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 57:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 58.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on clocks for vehicles in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of clocks for vehicles using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 58:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 59.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on stop watches in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of stop watches using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 59:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 60.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on wall clocks in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of wall clocks using the LOVE IS FOREVER mark on or before May 13, 2009.

RESPONSE 60:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

INTERROGATORY NO. 61.:

IDENTIFY all evidence of YOUR intent to use the LOVE IS FOREVER mark on alarm clocks in the United States, including business plans, marketing plans, advertising and/or promotions referencing YOUR intent to use the mark; actual uses of the mark by YOU in commerce, including specific channels of trade, geographic area and time periods for each use; and all sales made in the United States of alarm clocks using the LOVE IS FOREVER mark on

or before May 13, 2009.

RESPONSE 61:

It seems that your Interrogatory No. 1 to 61 etc are beautifully well prepared.

But they are morally beautiful or not might be another matter, that is, you have been well accepted by people, clients, clients-to-be, to be prosperous or not is another matter, I feel.

Murdering, terrorism, human trafficking etc are result etc of self-centered manner/way/purpose etc, which are ANTISOCIAL, I feel.

I would like to say INTERROGATORY NO. 1 to 61 are OBSTRUCTION OF BUSINESS, MY PRIVACY, MY TRADE SECRET etc and IRRELEVANT and UNWELCOME to my business and privacy etc, and INTERROGATORY NO. 1 to 61 are of/by self-centered manner/way/purpose etc, which could be said ANTISOCIAL and if among them existing anti lawful, I would like to dismiss it/them, I think.

But if you wisely smartly decide to withdraw from this case, then the gods of everlasting prosperity having slept will be awoke to become happy to hurriedly/welcomingly visit and to be with you from all over the world.

Hereinafter same as the mentioned in RESPONSE 1.

Sincerely yours,

Defendant

Souki Manufacturing Inc.

Nobuhiko Minaki (Mr.)

Representative Director

Entrepreneur, Trademark Creator, Owner, User

326-6 Sakamoto-cho, Hodogaya-ku, Yokohama-shi

Kanagawa, 240-0043, Japan

Tel 81-45-333-4525 81-45-332-7890 direct

Fax 81-45-515-0047 E-mail mina-csj@nifty.com

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Plaintiff Trademark:

LOVE IS FOREVER

Serial Number:

86285762

Filing Date:

May 19, 2014

Refusal Issue/Mailing Date:

August 27, 2014

Defendant Trademark:

LOVE IS FOREVER ®

Registration No.:

3811074

Filing Date:

May 13, 2009

Registration Date:

June 29, 2010

Plaintiff

L.A. Gem and Jewlry Design, Inc.

Assigned Attorney

Mr. Milord A. Keshishian

Milord & Associates PC

Cancellation No.: 92060328

Defendant

Souki Manufacturing Inc.

Nobuhiko Minaki (Mr.) Representative Director

Trademark Creator, Owner, User

April 07, 2016 JST

Ref number: Souki 160402

RESPONSES OF DEFENDANT FOR REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1.:

All DOCUMENTs which constitute promotional material, including but not limited to catalogues, brochures, flyers, posters, sales sheets, coupons, direct mailers, price lists, posters, vouchers, websites, social media, online marketing firms, publicity releases and/or other advertisements distributed by YOU which depict, refer, or relate to the LOVE IS FOREVER mark used in connection with YOUR goods in United States commerce within the last ten (10) years.

RESPONSE 1:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF

BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

The grounds of this case asserted by Mr. Milord A. Keshishian and member is ABANDONMENT of/by me my trademark, Love is Forever ®, but I have never abandoned as I repeatedly explained since filing this case 11/05/2014 etc and since I have started to intend to use this trademark, Love is Forever ® and I have started to prepare the products for the trademark.

Another ANTISOCIAL point is Mr. Milord A. Keshishian and the member have been telling opposite way to the fact and try to make TTAB to believe opposite way to the fact by telling I have abandoned my trademark, Love is Forever ®, in this way I have been felt. I have never abandoned the trademark. I have been preparing my products for the trademark.

This ANTISOCIAL point has been known/confirmed by TTAB, so feel I hypothetically.

It is highly ANTISOCIAL and unwelcome that telling the opposite to the truth trying to make TTAB to believe opposite way to the fact abusing the difficulty of overseas matter to confirm, such as I, defendant, being in Yokohama in Japan as Pro Se no proxy in USA.

So people, even an infant has been highly respectfully recommending you saying "Mr. Milord A. Keshishian and the member. The wrinkled no tooth old man and witch, go away," I hypothetically has been felt.

Life is short, even you live 100 years old, it is 36,500 days only.

The strongest is morally good because people, clients, clients-to-be are happy to be with morally good persons etc.

You are professional but I am an amateur in legal matter, and so if you lose, it will ruin yourself and qualification of attorney substantially completely, I feel so hypothetically. I suppose that is why Madam Catherine M. C. Farrelly had withdrawn wisely smartly from the case and it was appraised by legal matter market, clients and clients-to-be, I think. And it seems that she has been very busy in her legal business since withdrawal.

I think her withdrawal from her case, 92058656, realized/achieved to obtain belief/reliability/supports of her clients, clients-to-be etc, demand of market of legal matter, I think. She did a very effective/fruitful performance, the withdrawal, it obtains the successfulness to achieve/attain/satisfy the legal market demand, I feel. If she moves step by step accordingly from now on her business future is to be so shiny/bright, I feel.

I had sincerely presented the words "I am certain that prosperity is happy to visit you," as a merchant or so when she had started to take the procedure to withdraw from 92058656 September 24 or so, 2015 Japan Standard Time.

REQUEST FOR PRODUCTION NO. 2.:

All DOCUMENTs which constitute promotional material, including but not limited to catalogues, brochures, flyers, posters, sales sheets, coupons, direct mailers, price lists, posters, vouchers, websites, social media, online marketing firms, publicity releases and/or other advertisements distributed by YOU which depict, refer, or relate to the LOVE IS FOREVER mark used in connection with YOUR goods within the last ten (10) years.

RESPONSE 2:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY

PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 3.:

All DOCUMENTs which identify the geographic markets in which each such promotional material identified in response to Request No. 1 has been used or circulated by YOU, and the consumers targeted by each such promotional material.

RESPONSE 3:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly

withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 4.:

All DOCUMENTs relating to business plans, proposals, and any other efforts by YOU to sell or offer to sell products in connection with the LOVE IS FOREVER mark in United States commerce.

RESPONSE 4:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 5.:

All DOCUMENTs relating to business plans, proposals, and any other efforts by YOU

to sell or offer to sell products in connection with the LOVE IS FOREVER mark in commerce.

RESPONSE 5:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 6.:

All DOCUMENTs pertaining to investigations, consumer or market-research studies, surveys, polls, or other inquiries, conducted by or on behalf of YOU that refers or relates to goods sold in connection with the LOVE IS FOREVER mark in the United States.

RESPONSE 6:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 7.:

All DOCUMENTs pertaining to investigations, consumer or market-research studies, surveys, polls, or other inquiries, conducted by or on behalf of YOU that refers or relates to goods sold in connection with the LOVE IS FOREVER mark.

RESPONSE 7:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 8.:

All DOCUMENTs relating to contracts with any advertising agency or marketing agency relating to the sale of each product in connection with YOUR LOVE IS FOREVER mark in the United States.

RESPONSE 8:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB

smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 9.:

All DOCUMENTs relating to contracts with any advertising agency or marketing agency relating to the sale of each product in connection with YOUR LOVE IS FOREVER mark.

RESPONSE 9:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 10.:

All DOCUMENTs which constitute, show, or reflect YOUR gross revenue from sales of products in connection with the LOVE IS FOREVER mark in the United States for each of the

last ten (10) years.

RESPONSE 10:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 11.:

All DOCUMENTs which constitute, show, or reflect YOUR gross revenue from sales of products in connection with the LOVE IS FOREVER mark in the last ten (10) years.

RESPONSE 11:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION,

REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 12.:

All DOCUMENTs referring or relating to costs incurred by YOU for manufacturing, distributing, importing, exporting, or selling products in connection with the LOVE IS FOREVER mark in the United States for each of the last ten (10) years.

RESPONSE 12:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 13.:

All DOCUMENTs referring or RELATING TO costs incurred by YOU for manufacturing, distributing, importing, exporting, or selling products in connection with the LOVE IS FOREVER mark for each of the last ten (10) years.

RESPONSE 13:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and

come to her, I think.

Hereinaster same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 14.:

All DOCUMENTs which constitute, show, or reflect financial reports or summaries resulting from the sale of goods in connection with the LOVE IS FOREVER mark in the United States for each of the last ten (10) years.

RESPONSE 14:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdraw from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 15.:

All DOCUMENTs which constitute, show, or reflect financial reports or summaries resulting from the sale of goods in connection with the LOVE IS FOREVER mark for each of the last ten (10) years.

RESPONSE 15:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 16.:

All DOCUMENTs in their native format (e.g. msg, emlx, CAD, PowerPoint, Word, Adobe Illustrator, or Draw), which constitute, show, or reflect any COMMUNICATION between YOU and any PERSON relating to the goods sold in connection with the LOVE IS FOREVER mark in the United States in the last ten (10) years.

RESPONSE 16:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 17.:

All DOCUMENTs in their native format (e.g. msg, emlx, CAD, PowerPoint, Word, Adobe Illustrator, or Draw), which constitute, show, or reflect any COMMUNICATION between YOU and any PERSON relating to the goods sold in connection with the LOVE IS FOREVER mark in the last ten (10) years.

RESPONSE 17:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 18.:

All DOCUMENTs in their native format (e.g. msg, emlx, CAD, PowerPoint, Word, Adobe Illustrator, or Draw), which constitute, show, or reflect any communication between YOU and YOUR supplier, distributor, designer, or vendor relating to goods sold in connection with the LOVE IS FOREVER mark in the United States in the last ten (10) years.

RESPONSE 18:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 19.:

All DOCUMENTs in their native format (e.g. msg, emlx, CAD, PowerPoint, Word, Adobe Illustrator, or Draw), which constitute, show, or reflect any communication between YOU and YOUR supplier, distributor, designer, or vendor relating to goods sold in connection with the LOVE IS FOREVER mark in the last ten (10) years.

RESPONSE 19:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 20.:

All DOCUMENTs in their native format (e.g. msg, emlx, CAD, PowerPoint, Word, Adobe Illustrator, or Draw), which constitute, show, or reflect any communication or correspondence relating to the creation of the goods sold in connection with the LOVE IS FOREVER mark in the United States in the last ten (10) years.

RESPONSE 20:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 21.:

All DOCUMENTs in their native format (e.g. msg, emlx, CAD, PowerPoint, Word, Adobe Illustrator, or Draw), which constitute, show, or reflect any communications or correspondence relating to the creation of the goods sold in connection with the LOVE IS FOREVER mark in the last ten (10) years.

RESPONSE 21:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 22.:

All computer files containing images of the goods YOU sold or anticipated to sell in connection with the LOVE IS FOREVER mark in the United States in the last ten (10) years, including images of mock-ups, samples, and/or prototypes.

RESPONSE 22:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 23.:

All computer files containing images of the goods YOU sold or anticipated to sell in connection with the LOVE IS FOREVER mark in the last ten (10) years, including images of mock-ups, samples, and/or prototypes.

RESPONSE 23:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 24.:

All DOCUMENTs relating to the creation, manufacture, purchase, exportation, and/or importation of materials pertaining to the goods YOU sold or anticipated to sell in connection with the LOVE IS FOREVER mark in the United States in the last ten (10) years.

RESPONSE 24:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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REQUEST FOR PRODUCTION NO. 25.:

All DOCUMENTs relating to the creation, manufacture, purchase, exportation, and/or importation of materials pertaining to the goods YOU sold or anticipated to sell in connection with the LOVE IS FOREVER mark in the last ten (10) years.

RESPONSE 25:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 26.:

All DOCUMENTs which constitute, show, or reflect any contracts or agreements relating to the creation, manufacture, purchase, exportation, and/or importation of goods sold or anticipated to be sold in connection with the LOVE IS FOREVER mark in the United States.

RESPONSE 26:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 27.:

All DOCUMENTs which constitute, show, or reflect any contracts or agreements relating to the creation, manufacture, purchase, exportation, and/or importation of goods sold or anticipated to be sold in connection with the LOVE IS FOREVER mark.

RESPONSE 27:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 28.:

All DOCUMENTs which constitute, show, or reflect the identity of YOUR employees or agents that were involved in marketing, selling, distributing, purchasing, or shipping of goods in connection with the LOVE IS FOREVER mark in the United States.

RESPONSE 28:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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REQUEST FOR PRODUCTION NO. 29.:

All DOCUMENTs which constitute, show, or reflect the identity of YOUR employees or agents that were involved in marketing, selling, distributing, purchasing, or shipping of goods in connection with the LOVE IS FOREVER mark.

RESPONSE 29:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinaster same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 30.:

All DOCUMENTs which constitute, show, or reflect the shipping or delivery of goods used in connection with the LOVE IS FOREVER mark in the United States.

RESPONSE 30:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 31.:

All DOCUMENTs which constitute, show, or reflect the shipping or delivery of goods used in connection with the LOVE IS FOREVER mark.

RESPONSE 31:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to

grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinaster same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 32.:

All DOCUMENTs which constitute, show, or reflect any agreements between YOU and any PERSON for the purchase of goods in connection with the LOVE IS FOREVER mark in the United States.

RESPONSE 32:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 33.:

All DOCUMENTs which constitute, show, or reflect any agreements between YOU and any PERSON for the purchase of goods in connection with the LOVE IS FOREVER mark.

RESPONSE 33:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 34.:

All DOCUMENTs which constitute, show, or reflect any agreements between YOU and any PERSON for the sale of goods in connection with the LOVE IS FOREVER mark in the United States.

RESPONSE 34:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 35.:

All DOCUMENTs which constitute, show, or reflect any agreements between YOU and any PERSON for the sale of goods in connection with the LOVE IS FOREVER mark.

RESPONSE 35:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 36.:

All DOCUMENTs which constitute, show, or reflect YOUR communications with any other PERSON regarding the purchase or negotiations to purchase any goods sold in connection with the LOVE IS FOREVER mark in the United States.

RESPONSE 36:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case,

hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 37.:

All DOCUMENTs which constitute, show, or reflect YOUR communications with any other PERSON regarding the purchase or negotiations to purchase any goods sold in connection with the LOVE IS FOREVER mark.

RESPONSE 37:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY

PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 38.:

All DOCUMENTs which constitute, show, or reflect all shipping activity, including, without limitation, freight DOCUMENTs, bills of sale, bills of lading, packing slips, etc. that refer to the shipping or other transportation of goods sold in connection with the LOVE IS FOREVER mark in the United States.

RESPONSE 38:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for

prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 39.:

All DOCUMENTs which constitute, show, or reflect all shipping activity, including, without limitation, freight DOCUMENTs, bills of sale, bills of lading, packing slips, etc. that refer to the shipping or other transportation of goods sold in connection with the LOVE IS FOREVER mark.

RESPONSE 39:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 40.:

All DOCUMENTs which relate to the importation of the goods sold in connection with the LOVE IS FOREVER mark into the United States.

RESPONSE 40:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 41.:

All DOCUMENTs which constitute, show, or reflect all other forms or other information YOU were required to complete and maintain by the United States government relating to the importation of the goods sold in connection with the LOVE IS FOREVER mark.

RESPONSE 41:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF

BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinaster same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 42.:

All DOCUMENTs which constitute, show, or reflect YOUR bona fide intent to use the LOVE IS FOREVER mark in commerce in the United States prior to May 13, 2009.

RESPONSE 42:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY

PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 43.:

All DOCUMENTs which constitute, show, or reflect all United States Customs forms or other DOCUMENTs that refer to the importation by YOU of goods sold in connection with the LOVE IS FOREVER mark.

RESPONSE 43:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly

withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 44.:

All DOCUMENTs and things referred to in YOUR answers to interrogatories served by Petitioner.

RESPONSE 44:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR PRODUCTION NO. 45.:

All DOCUMENTs and things referred to in YOUR Rule 26 Disclosures.

RESPONSE 45:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. And the request, REQUEST FOR PRODUCTION NO. 45, is difficult to understand, which seems to be IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Because I have never abandoned my trademark concerned, and so because this filing of cancellation itself has no grounds, without which you can/should not file/raise this case or any case. So it is nonsense/groundless to mention regarding that REQUEST FOR PRODUCTION NO. 45 "All DOCUMENTs and things referred to in YOUR Rule 26 Disclosures,"

So I do recommend that Mr. Milord A. Keshishian and the member will wisely withdraw from this case, and you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

Hereinafter same as the aforementioned in RESPONSE 1.

Sincerely yours,

Defendant

Souki Manufacturing Inc.

Nobuhiko Minaki (Mr.)

Representative Director

Entrepreneur, Trademark Creator, Owner, User

326-6 Sakamoto-cho, Hodogaya-ku, Yokohama-shi

Kanagawa, 240-0043, Japan

Tel 81-45-333-4525 81-45-332-7890 direct

Fax 81-45-515-0047 E-mail mina-csj@nifty.com

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Plaintiff Trademark:

LOVE IS FOREVER

Serial Number:

86285762

Filing Date:

May 19, 2014

Refusal Issue/Mailing Date:

August 27, 2014

Defendant Trademark:

LOVE IS FOREVER ®

Registration No.:

3811074

Filing Date:

May 13, 2009

Registration Date:

June 29, 2010

Plaintiff

L.A. Gem and Jewlry Design, Inc.

Assigned Attorney

Mr. Milord A. Keshishian

Milord & Associates PC

Cancellation No.: 92060328

Defendant

Souki Manufacturing Inc.

Nobuhiko Minaki (Mr.) Representative Director

Trademark Creator, Owner, User

April 07, 2016 JST

Ref number: Souki 160401

RESPONSES OF DEFENDANT FOR REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with key rings of precious metal at any time during the last ten years.

RESPONSE 1:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION,

REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. So, I will strongly recommend for you and your member to withdraw/refrain from this case and from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy/prosperous office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

The grounds of this case asserted by Mr. Milord A. Keshishian and member is ABANDONMENT of/by me my trademark, Love is Forever ®, but I have never abandoned as I repeatedly explained since filing this case 11/05/2014 etc and since I have started to intend to use this trademark, Love is Forever ® and I have started to prepare the products for the trademark.

Another ANTISOCIAL point is Mr. Milord A. Keshishian and the member have been telling opposite way to the fact and try to make TTAB to believe opposite way to the fact by telling I have abandoned my trademark, Love is Forever ®, in this way I have been felt. I have never abandoned the trademark. I have been preparing my products for the trademark.

This ANTISOCIAL point has been known/confirmed by TTAB, so feel I hypothetically.

It is highly ANTISOCIAL and unwelcome that telling the opposite to the truth trying to make TTAB to believe opposite way to the fact abusing the difficulty of overseas matter to confirm, such as I, defendant, being in Yokohama in Japan as Pro Se no proxy in USA.

So people, even an infant has been highly respectfully recommending you saying "Mr. Milord A. Keshishian and the member. The wrinkled no tooth old man and witch, go away," I hypothetically has been felt.

Life is short, even you live 100 years old, it is 36,500 days only.

The strongest is morally good because people, clients, clients-to-be are happy to be with morally good persons etc.

You are professional but I am an amateur in legal matter, and so if you lose, it will ruin yourself and qualification of attorney substantially completely, I feel so hypothetically. I suppose that is why Madam Catherine M. C. Farrelly had withdrawn wisely smartly from the case and it was appraised by legal matter market, clients and clients-to-be, I think. And it seems that she has been very busy in her legal business since withdrawal.

I think her withdrawal from her case, 92058656, realized/achieved to obtain belief/reliability/supports of her clients, clients-to-be etc, demand of market of legal matter, I think. She did a very effective/fruitful performance, the withdrawal, it obtains the successfulness to achieve/attain/satisfy the legal market demand, I feel. If she moves step by step accordingly from now on her business future is to be so shiny/bright, I feel.

I had sincerely presented the words "I am certain that prosperity is happy to visit you," as a merchant or so when she had started to take the procedure to withdraw from 92058656 September 24 or so, 2015 Japan Standard Time.

REQUEST FOR ADMISSION NO. 2.

Admit that YOU did not advertise or promote key rings of precious metal in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, web site, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 2:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 3.

Admit that YOU did not sell any key rings of precious metal in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 3:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and

come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 4.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with key rings of precious metal at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 4:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 5.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with key rings of precious metal prior to May 13, 2009.

RESPONSE 5:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 6.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to key rings of precious metal in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 6:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 7.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with earrings at any time during the last ten years.

RESPONSE 7:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 8.

Admit that YOU did not advertise or promote earrings in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 8:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 9.

Admit that YOU did not sell any earrings in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 9:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 10.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with earrings at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational

plans, projected sales, and financial plans.

RESPONSE 10:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 11.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with earrings prior to May 13, 2009.

RESPONSE 11:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 12.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to earnings in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 12:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 13.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with precious metal insignias at any time during the last ten years.

RESPONSE 13:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 14.

Admit that YOU did not advertise or promote precious metal insignias in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 14:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 15.

Admit that YOU did not sell any precious metal insignias in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 15:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 16.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with precious metal insignias at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 16:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 17.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with precious metal insignias prior to May 13, 2009.

RESPONSE 17:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 18.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to precious metal insignias in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 18:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REOUEST FOR ADMISSION NO. 19.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with precious metal badges at any time during the last ten years.

RESPONSE 19:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 20.

Admit that YOU did not advertise or promote precious metal badges in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 20:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 21.

Admit that YOU did not sell any precious metal badges in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 21:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 22.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with precious metal badges at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 22:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 23.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with precious metal badges prior to May 13, 2009.

RESPONSE 23:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and

come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 24.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to precious metal badges in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 24:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 25.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with precious metal medals at any time during the last ten years.

RESPONSE 25:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 26.

Admit that YOU did not advertise or promote precious metal medals in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 26:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 27.

Admit that YOU did not sell any precious metal medals in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 27:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 28.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with precious metal medals at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 28:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 29.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with precious metal medals prior to May 13, 2009.

RESPONSE 29:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 30.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to precious metal medals in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 30:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 31.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with tiepins at any time during the last ten years.

RESPONSE 31:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 32.

Admit that YOU did not advertise or promote tiepins in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, directmailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 32:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 33.

Admit that YOU did not sell any tiepins in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 33:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 34.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with tiepins at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 34:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 35.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with tiepins prior to May 13, 2009.

RESPONSE 35:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 36.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to tiepins in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 36:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 37.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with necklaces at any time during the last ten years.

RESPONSE 37:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 38.

Admit that YOU did not advertise or promote necklaces in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 38:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 39.

Admit that YOU did not sell any necklaces in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 39:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 40.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with necklaces at any time during the last ten years, including without limitation, specific business goals, marketing plans,

operational plans, projected sales, and financial plans.

RESPONSE 40:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 41.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with necklaces prior to May 13, 2009.

RESPONSE 41:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 42.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to necklaces in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 42:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 43.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with bracelets at any time during the last ten years.

RESPONSE 43:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 44.

Admit that YOU did not advertise or promote bracelets in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 44:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 45.

Admit that YOU did not sell any bracelets in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 45:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 46.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with bracelets at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 46:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 47.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with bracelets prior to May 13, 2009.

RESPONSE 47:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 48.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to bracelets in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 48:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 49.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with pendants at any time during the last ten years.

RESPONSE 49:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

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Hereinaster same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 50.

Admit that YOU did not advertise or promote pendants in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade

shows.

RESPONSE 50:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 51.

Admit that YOU did not sell any pendants in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 51:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION,

REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 52.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with pendants at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 52:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 53.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with pendants prior to May 13, 2009.

RESPONSE 53:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 54.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to pendants in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 54:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REOUEST FOR ADMISSION NO. 55.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with jewelry brooches at any time during the last ten years.

RESPONSE 55:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 56.

Admit that YOU did not advertise or promote jewelry brooches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 56:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 57.

Admit that YOU did not sell any jewelry brooches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 57:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 58.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with jewelry brooches at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 58:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 59.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with jewelry brooches prior to May 13, 2009.

RESPONSE 59:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 60.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to jewelry brooches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 60:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 61.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with medals at any time during the last ten years.

RESPONSE 61:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become

good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 62.

Admit that YOU did not advertise or promote medals in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 62:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 63.

Admit that YOU did not sell any medals in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 63:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 64.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with medals at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 64:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 65.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with medals prior to May 13, 2009.

RESPONSE 65:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 66.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to medals in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 66:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 67.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with rings to wear on fingers at any time during the last ten years.

RESPONSE 67:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 68.

Admit that YOU did not advertise or promote rings to wear on fingers in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 68:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 69.

Admit that YOU did not sell any rings to wear on fingers in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 69:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 70.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with rings to wear on fingers at any time during the last ten years, including without limitation, specific business goals, marketing

plans, operational plans, projected sales, and financial plans.

RESPONSE 70:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 71.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with rings to wear on fingers prior to May 13, 2009.

RESPONSE 71:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 72.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to rings to wear on fingers in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 72:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 73.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with medallions at any time during the last ten years.

RESPONSE 73:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 74.

Admit that YOU did not advertise or promote medallions in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 74:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 75.

Admit that YOU did not sell any medallions in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 75:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 76.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with medallions at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 76:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 77.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with medallions prior to May 13, 2009.

RESPONSE 77:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 78.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to medallions in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 78:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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REQUEST FOR ADMISSION NO. 79.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with cuff links at any time during the last ten years.

RESPONSE 79:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 80.

Admit that YOU did not advertise or promote cuff links in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 80:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 81.

Admit that YOU did not sell any cuff links in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 81:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 82.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with cuff links at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 82:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case,

you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

UEST FOR ADMISSION NO. 83.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with cuff links prior to May 13, 2009.

RESPONSE 83:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

REQUEST FOR ADMISSION NO. 84.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to cuff links in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 84:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REOUEST FOR ADMISSION NO. 85.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with clocks at any time during the last ten years.

RESPONSE 85:

Grounds for this Cancellation is abandonment of my trademark, but which I have never 69/113

abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 86.

Admit that YOU did not advertise or promote clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 86:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become

good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 87.

Admit that YOU did not sell any clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 87:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 88.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with clocks at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 88:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

REQUEST FOR ADMISSION NO. 89.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with clocks prior to May 13, 2009.

RESPONSE89:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 90.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 90:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REOUEST FOR ADMISSION NO. 91.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with watches at any time during the last ten years.

RESPONSE91:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 92.

Admit that YOU did not advertise or promote watches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE92:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 93.

Admit that YOU did not sell any watches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE93:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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REQUEST FOR ADMISSION NO. 94.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with watches at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE94:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 95.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with watches prior to May 13, 2009.

RESPONSE 95:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 96.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to watches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 96:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 97.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with wristwatches at any time during the last ten years.

RESPONSE 97:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 98.

Admit that YOU did not advertise or promote wristwatches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 98:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

REQUEST FOR ADMISSION NO. 99.

Admit that YOU did not sell any wristwatches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 99:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 100.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with wristwatches at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 100:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 101.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with wristwatches prior to May 13, 2009.

RESPONSE 101:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 102.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to wristwatches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 102:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 103.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with table clocks at any time during the last ten years.

RESPONSE 103:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

REQUEST FOR ADMISSION NO. 104.

Admit that YOU did not advertise or promote table clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 104:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 105.

Admit that YOU did not sell any table clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 105:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 106.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with table clocks at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 106:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 107.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with table clocks prior to May 13, 2009.

RESPONSE 107:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 108.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to table clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 108:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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REQUEST FOR ADMISSION NO. 109.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with pocket watches at any time during the last ten years.

RESPONSE 109:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 110.

Admit that YOU did not advertise or promote pocket watches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 110:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 111.

Admit that YOU did not sell any pocket watches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 111:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 112.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with pocket watches at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 112:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 113.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with pocket watches prior to May 13, 2009.

RESPONSE 113:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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REQUEST FOR ADMISSION NO. 114.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to pocket watches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 114:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 115.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with clocks for vehicles at any time during the last ten years.

RESPONSE 115:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 116.

Admit that YOU did not advertise or promote clocks for vehicles in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 116:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION,

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And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 117.

Admit that YOU did not sell any clocks for vehicles in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 117:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case,

you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 118.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with clocks for vehicles at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 118:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 119.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with clocks for vehicles prior to May 13, 2009.

RESPONSE 119:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 120.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to clocks for vehicles in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 120:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 121.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with stopwatches at any time during the last ten years.

RESPONSE 121:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 122.

Admit that YOU did not advertise or promote stopwatches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 122:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 123.

Admit that YOU did not sell any stopwatches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 123:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 124.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with stopwatches at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 124:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 125.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with stopwatches prior to May 13, 2009.

RESPONSE 125:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 126.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to stopwatches in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 126:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 127.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with wall clocks at any time during the last ten years.

RESPONSE 127:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 128.

Admit that YOU did not advertise or promote wall clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 128:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 129.

Admit that YOU did not sell any wall clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 129:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 130.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with wall clocks at any time during the last ten years, including without limitation, specific business goals, marketing plans operational plans, projected sales, and financial plans.

RESPONSE 130:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 131.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with wall clocks prior to May 13, 2009.

RESPONSE 131:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REOUEST FOR ADMISSION NO. 132.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to wall clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 132:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 133.

Admit that YOU made no use in commerce of the LOVE IS FOREVER mark in the United States in connection with alarm clocks at any time during the last ten years.

RESPONSE 133:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 134.

Admit that YOU did not advertise or promote alarm clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years, either via newspaper, brochure, flyer, poster, trade journal, magazine, catalogue, pamphlet, coupon, direct mailer, voucher, website, social media, online marketing firms, publicity releases, or at trade shows.

RESPONSE 134:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and MY PRIVACY.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 135.

Admit that YOU did not sell any alarm clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 135:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 136.

Admit that YOU created no business plans referencing your intent to use the LOVE IS FOREVER mark in United States commerce in connection with alarm clocks at any time during the last ten years, including without limitation, specific business goals, marketing plans, operational plans, projected sales, and financial plans.

RESPONSE 136:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

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good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 137.

Admit that YOU have no evidence relating to YOUR bona fide intent to use the LOVE IS FOREVER mark in connection with alarm clocks prior to May 13, 2009.

RESPONSE 137:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even

internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

REQUEST FOR ADMISSION NO. 138.

Admit that YOU conducted no investigations, consumer or market-research studies, surveys, polls, or other relating to alarm clocks in connection with the LOVE IS FOREVER mark in the United States at any time during the last ten years.

RESPONSE 138:

Grounds for this Cancellation is abandonment of my trademark, but which I have never abandoned, which is issues/merits of this case. So the request is IRRELEVANT REQUEST to grounds/issues/merits and IRRELEVANT REQUEST is to be OBSTRUCTION OF BUSINESS and MY PRIVACY, too, which are very ANTISOCIAL point of this case, hypothetically I think.

The IRRELEVANT REQUESTS etc, 244 altogether, in REQUESTS FOR ADMISSION, REQUESTS FOR PRODUCTION and INTERROGATORIES, and they are to become good evidences for OBSTRUCTIONS OF BUSINESS, too.

And you are professional but I am an amateur in legal matter, so if you lose this case it will ruin yourself and qualification of attorney substantially completely, I hypothetically feel so. Please refrain from doing OBSTRUCTION OF BUSINESS and OBSTRUCTION OF MY PRIVACY.

But if Mr. Milord A. Keshishian and the member will wisely withdraw from this case, you and your office will have the strong possibility to be reputed/recognized even internationally as one of the most respectful, wisest attorney and famous/busy office.

It will be strongly recommended for you to make your own decision to withdraw for prosperity. As Madam Catherine M. C. Farrelly withdrew from 92058656, smartly/advertisingly withdrawal will invite prosperity. She expressed her withdrawal on homepage of TTAB smartly/advertisingly, I think. Then her clients and clients-to-be have become happy to visit and come to her, I think.

Hereinafter same as the aforementioned in RESPONSE 1.

Sincerely yours,

Defendant

Souki Manufacturing Inc.

Nobuhiko Minaki (Mr.)

Representative Director

Entrepreneur, Trademark Creator, Owner, User

326-6 Sakamoto-cho, Hodogaya-ku, Yokohama-shi

Kanagawa, 240-0043, Japan

Tel 81-45-333-4525 81-45-332-7890 direct

Fax 81-45-515-0047 E-mail mina-csj@nifty.com



June 3, 2016

<u>Via email: mina-csj@nifty.com</u> Confirmation Via International Mail

Mr. Nobuhiko Minaki Souki Manufacturing, Inc. 326-6 Sakamoto-cho, Hodogaya-ku, Yokohama-shi Kanagawa, 240-0043, Japan

Re: L.A. Gem & Jewelry Design, Inc. v. Souki Manufacturing, Inc.

USPTO, Trademark Trial and Appeal Board

Cancellation No.: 92060328 Our Ref.: LAR08-061T

Dear Mr. Minaki:

We reviewed Souki Manufacturing, Inc.'s ("Souki") responses to L.A. Gem & Jewelry Design, Inc. dba L.A. Rocks ("L.A. Gem") First Set of Requests for Production, First Set of Requests for Admission, and First Set of Interrogatories. Pursuant to 37 CFR § 2.120(e), please consider this letter as our meet and confer effort concerning the deficiencies in your responses, as noted below.

Responses in General

L.A. Gem served Souki with its First Set of Interrogatories, First Set of Requests for Production and First Set of Requests for Admission on March 11, 2016. Souki's responses are missing, incomplete, and deficient as discussed below. It has been over sixty (60) days since L.A. Gem requested information and documents. To date, Souki has failed to produce any responsive documents. In addition, Souki repeats verbatim the same unsubstantiated, incomprehensible responses to virtually all of L.A. Gem's Interrogatories, Requests for Production, and Requests for Admission.

Souki's Responses to L.A. Gem's First Set of Interrogatories

Souki's Responses to L.A. Gem's First Set of Interrogatories are incomprehensible and unintelligible. Souki repeatedly parrots the same lengthy, unresponsive narrative in response to all sixty-one (61) of L.A. Gem's Interrogatories. Rather than identifying any information sought by L.A. Gem, Souki improperly, conclusively and repeatedly states that it has not abandoned the LOVE IS FOREVER mark. For example, L.A. Gem asks Souki to identify the LOVE IS FOREVER mark's date of first use in United States commerce; steps taken to develop goods sold in connection with the mark; and states where goods have been sold under the mark, to which Souki responds that it has not abandoned the mark.

Further, Souki has failed to properly object to any of L.A. Gem's Interrogatories. Thus, Souki waives all objections. A party objecting to an interrogatory must "particularize" its basis for each objection. Fed. R. Civ. P. 33(b)(4) ("The grounds for objecting to an interrogatory must be stated with specificity."); see also Burns v. Imagine Films Entertainment, Inc., 164 F.R.D. 589, 593 (W.D.N.Y. 1996) ("[O]bjections to interrogatories must be specific and supported by detailed explanation of why the interrogatories are objectionable."). Souki has not asserted any objections or provided any explanation for why L.A. Gem's Interrogatories are objectionable. Thus, Souki must provide substantive responses to each of L.A. Gem's Interrogatories.

Souki's Responses to L.A. Gem's First Set of Requests for Admissions

Souki's Responses to L.A. Gem's First Set of Requests for Admissions are incomprehensible and unintelligible. Souki repeatedly parrots the same lengthy, unresponsive narrative in response to all one hundred and thirty-eight (138) of L.A. Gem's Requests for Admissions. Rather than admitting or denying any information sought by L.A. Gem, Souki improperly, conclusively and repeatedly states that it has not abandoned the LOVE IS FOREVER mark. For example, L.A. Gem asks Souki to admit it made no actual use, and lacks evidence of its bona fide intent to use, the LOVE IS FOREVER mark in connection with goods listed in its registration in United States commerce, to which Souki responds that it has not abandoned the mark.

Further, Souki has failed to properly object to any of L.A. Gem's Requests for Admissions. Thus, Souki waives all objections. A party objecting to a request for admission has the burden of "clarifying, explaining, and supporting its objections." *DirecTV, Inc. v. Trone*, 209 F.R.D. 455, 458 (C.D. Cal. 2002). *See A. Farber & Ptnrs, Inc. v. Garber*, 234 F.R.D. 186, 188 (C.D. Cal. 2006) (general boilerplate objections are improper where they fail to set forth any explanation or argument why the requested documents are irrelevant). Souki purports to object to all one hundred and thirty-eight (138) of L.A. Gem's Requests as "irrelevant" in a boilerplate manner. However, L.A. Gem's Requests for information demonstrating Souki's use of the LOVE IS FOREVER mark is entirely relevant to L.A. Gem's cancellation proceedings, and Souki fails to provide any explanation to the contrary. Because Souki has not stated proper grounds for objection to any of L.A. Gem's Requests for Admissions, Souki must provide substantive responses to each Request.

Souki's Responses to L.A. Gem's First Set of Requests for Production

Souki's Responses to L.A. Gem's First Set of Requests for Production are incomprehensible and unintelligible. Souki repeatedly parrots the same lengthy, unresponsive narrative in response to all forty-five (45) of L.A. Gem's Requests for Productions. Rather than producing any documents or information responsive to L.A. Gem's Requests, Souki improperly, conclusively and repeatedly states that it has not abandoned the LOVE IS FOREVER mark. For

Mr. Nobuhiko Minaki June 3, 2016 Page 3

example, L.A. Gem requests documents such as promotional material, business plans, research conducted, advertising, financial reports, and images depicting use of the LOVE IS FOREVER mark in connection with Souki's goods in United States commerce, to which Souki responds that it has not abandoned the mark.

Further, Souki has failed to properly object to any of L.A. Gem's Requests for Production. Thus, Souki waives all objections. A party objecting to a request for production must do so with specificity. Fed. R. Civ. P. 34(b)(2) (a response must "state with specificity the grounds for objecting to the request, including the reasons," and must state "whether any responsive materials are being withheld on the basis of that objection."). Souki purports to object to all forty-five (45) of L.A. Gem's Requests as "irrelevant" in a boilerplate manner. However, L.A. Gem's Requests regarding information establishing Souki's use of the LOVE IS FOREVER mark are relevant to its cancellation proceedings, and Souki fails to provide any explanation to the contrary. Because Souki has not stated proper grounds for objection to any of L.A. Gem's Requests for Production, Souki must provide documents and information responsive to each Request.

In sum, Souki has failed to adequately respond to any of L.A. Gem's discovery requests, and its purported objections are not only baseless, but waived. Please provide your availability to meet and confer on June 9, 10, or 15, 2016.

This correspondence does not waive, limit or restrict any rights, claims, defenses or remedies, all of which are expressly reserved to the extent of law and equity. Thank you and if you have any questions or concerns, please feel free to contact our office.

Sincerely yours,
MILORD & ASSOCIATES

Milord A. Keshishian

MAK/svt

cc: Catherine Faint, Esq. (via email only)